

CONOCO

Interoffice Communication

To: Bjorn Arvesen, Conoco Norway
From: Dr. C. Roythorne, London
Date: 7 June 1982
Subject: NPD's HEARING DRAFT FOR GUIDELINES ON ASBESTOS AND PRODUCTS CONTAINING ASBESTOS

Thank you for forwarding me a copy of the above. Overall I find the proposed asbestos guidelines acceptable in concept, however there are one or two areas which require clarification and/or expansion by NPD and these are detailed.

Exceptions to the ban

P.7. para 1.

"Asbestos shall always be replaced by products that are not a health hazard when possible". Does this imply removing all existing asbestos when an alternative exists? or only when because of operational requirements it will be disturbed?

If the former applies then the amount of asbestos released to the atmosphere, despite precautions, will be far in excess of the latter with consequent increase in health risk, i.e. undisturbed asbestos provided it is known about and suitably marked is not a health risk.

Safe Handling

P.8. para 5

Under precautions it states "as far as technically possible the work processes shall take place in closed systems". Presumably this means handling small objects which require machining etc in an extracted work system, and also screening off larger work areas where asbestos is being handled and limiting entry to those suitably protected.

Personal Protective Equipment

P.9

No mention is made of cleansing reusable equipment or disposal of filters, etc.

Occupational Hygiene Norm

P.11. para 1

I would suggest adding the words - as far as is practicable (or possible) to this paragraph.

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P.11. para 2

Talks about a threshold limit having stated in para 1 no totally safe limit can be established. Para 2 therefore seems to be at variance and then proceeds to halve the existing limit presumably on an arbitrary basis

I would have anticipated that whenever there is the possibility of asbestos being released through a work process into an employee's breathing zone, then he wear respiratory, and if required, other protection. Consequently actual exposure will be as near zero as is possible.

Additionally, measures should also be adopted to minimise dust creation.

If the above actions were met, and indeed they are all contained in the guidelines, then the reduction of limits from 2 to 1 fibre/ml is only a paper exercise.

Preventative Medical Measures and Examinations

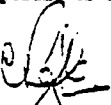
p.14, Section - Requirements for Medical Examination, para 1

There is some question as to who is to be examined. My understanding would be that if the guidelines were followed then only those handling or working with asbestos in situations likely to create atmosphere contamination would be potentially exposed. If this is not the case, then defining those who "might" be exposed is very difficult ranging from the whole workforce to only those handling it or indeed none of the workforce since with protection, in theory at least, no-one is exposed.

Section - Scope of Examination

Lacks a previous occupational history and family medical history (unless latter included in the first item of this section).

As I stated at the outset, I have no real problems with the Guidelines. However, I feel that unless the above points are clarified then we could be faced with arranging unnecessary medical examinations and also unnecessarily creating in peoples minds the "fear" associated with being "exposed" to asbestos.



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cc. Dr. E.L. DeWitt

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