

REC'D APR 18 1988

FROM

J. SHOCKEY  
SAFETY & IND. HYGIENE MANAGER  
POINT COMFORT OPERATIONS

TO MS. L. RIPPEY

PITTSBURGH - 06

Info cc: Mr. J. L. Palmer  
Mr. L. Flores  
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PLAINTIFF'S  
EXHIBIT  
AL-930

1988 April 13

RE: ASBESTOS STANDARD - COURT MANDATED RECONSIDERATION

In a recent letter, you indicated that the ORC (Organization Resources Counselors) was looking for feedback on the decisions of the recent U.S. Court of Appeals ruling.

I have these comments for you to include:

Reconsideration of the use of supplied air (i.e., air line respirators) or self-contained breathing apparatus exclusively for asbestos work is ludicrous.

Asbestos work is not always confined to schools and public buildings. The potential hazards of asbestos (as it is currently handled) when compared with that of an employee attempting to crawl through a complex pipe rack thirty (30) ft in the air complete with lifelines, tools, and a 35 lb air pack with thirty (30) minutes of supplied air, is minimal.

By requiring people to wear self-contained breathing apparatus (SCBA) OSHA will put greater physical demands on asbestos workers, require even more capital equipment and additional respirator training, maintenance, and the like. The only SCBA equipment currently on hand at Point Comfort is reserved for fire fighting and emergency response.

Air line respirators are used at Point Comfort where work conditions permit or potential exposures are great enough to warrant the additional protection. Again, air drops are not always readily available to every part of the plant or in every pipe rack. This requirement would also require acquisition of more air line hoods and several portable compressors. Air lines reduce flexibility in certain applications and may even encourage people to "cheat" for convenience in hard to access places.

At Point Comfort Operations we've found that the powered air purifying respirator offers a very good combination of versatility and protection. We do not use any mechanical filter respirators for asbestos protection.

The total number of people who would regularly use respiratory protection for asbestos work is approximately forty (40) persons; however, every general mechanic also has the potential to need to do so as well and that's about an additional two hundred (200) people.

My recommendation to our Management would probably be to move from in-house removal to outside contractor if this new OSHA procedure requiring air line or SCBA respirators was enacted into law. This might be a point worth emphasizing since some of the labor unions appear to be driving this



Ms. L. Rippey  
Page 2  
1988 April 13

issue in the courts. At some point it may even be worth discussing with the Steel Workers as I believe our folks at Point Comfort would like to keep this type of work and are comfortable with our current procedures and practices.

  
J. STOCKEY  
JS/cmp