

3/16 Sam Brown
Skip Gardner (info)
El Simpson

CMG

E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

Textile Fibers Department

I discussed this matter
with Mark -- also sent him
copies of our permit form --
Told him he covered the subject
agreements thoroughly.

March 7, 1984 C.D.D.

TO: L. R. ROBERTSON - OLD HICKORY
J. C. SWEENEY - CHATTANOOGA
W. C. LOONEY - CAMDEN
O. T. SKRETVEHDT - SPRUANCE
L. H. WILLIAMS - KINSTON
A. F. WELCH - CAPE FEAR
O. D. DURHAM - SEAFORD
D. C. KISCADEN - WAYNESBORO
J. E. FIELDS - MARTINSVILLE
J. H. BERTELS - COOPER RIVER

FROM: M. E. SABLA

ASBESTOS GUIDELINES

Attached is a summary, in short statement form, of the items concerning asbestos work practices which I feel we reached agreement on at our November 1983 Richmond asbestos meeting. They are in no particular order. I plan to use these statements as a basis for formulating a policy for asbestos.

I solicit your comments, additions, and suggestions. Please reply ASAP.

MES/bbh
Attachment

DUP 1011006

DU 053048

GUIDELINE STATEMENTS

- Continue efforts to eliminate the use of all asbestos containing material, where possible and practical.
- When replacing asbestos with non-asbestos insulation, identify all non-asbestos containing material using a system that is in keeping and consistent with plant housekeeping and safety standards (Engineering Standard SN218P).
- Unless clearly demonstrated by representative sampling and analysis that a material is not asbestos; all insulation not identified, or not known to be non-asbestos (composition unknown) will be treated as containing asbestos.
- Asbestos containing materials may be used where acceptable substitutes are not available - generally limited to temperature applications greater than _____ and _____.
- General guidelines on air contaminant sampling, employee notification, recordkeeping, and medical surveillance, covered in T.F. Occupational Health Policy - Airborne Contaminants, and Engineering Standard S-4-T should be followed.
- Comply with current interpretations OSHA 1910.1001(a) through (k). Going beyond the legal requirements where good industrial hygiene practice/personnel relations indicate is permissible provided the benefits bear a reasonable relationship to costs.
- Plants are discouraged from allowing any form of eating where asbestos containing materials are being handled or fabricated.
- When reporting exposure results (I.H. Data form, PERS, Employee Notification) report only 8H-TWA's and Ceiling (15 minute TWA's) values.
- Observe 0.5 f/cc >5u 8H-TWA, and 10 f/cc >5u Ceiling as exposure limits for all types of asbestos fibers.
- In all instances of working with asbestos, where exposures exceed 2f/cc >5u, engineering controls shall be used to reduce exposures below 2f/cc, where technically and economically feasible.
- In all cases when handling, working or removing asbestos, where practical, asbestos shall be handled/worked in a wetted state.

DUP 1011007

- Standard Operating Procedures (SOP's) shall be developed and written to detail the proper work procedures to minimize asbestos fiber generation. Required respiratory and personal protective equipment, work practices, equipment, barricading requirements, hygiene practices, and Federal/State reporting requirements will be covered in these SOP's.
- An audit system should be established (preferably a SHEA representative) to monitor adherence to SOP'S.
- To minimize asbestos fiber generation, the use of glove bags, sprayer and nozzles for wet down, and vacuum cleaner and accessories for cleanup are recommended.
- Consideration should be given to the use of exhaust ventilation with HEPA filters to establish negative pressure inside enclosed asbestos work areas.
- In any instance of spraying, demolition, or removal of asbestos containing materials, personal protective equipment will be required as follows:

respiratory protection specified and in accordance with Table I, CFR 1910.1001(k) with minimum acceptable respiratory protection being a reusable elastomeric mask, air purifying respirator.

Special clothing will be provided when ceiling exposures are reasonably expected to exceed 10 f/cc >5u as a 15 minute TWA, and/or when the time required to complete the work activity is expected to exceed 30 minutes, and in regulated areas.

- All plants should implement a "permit" system with the following minimum recommended elements.
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 - To be listed
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- Barricades should be provided in all cases where 8H-TWA and/or ceiling exposures are reasonably expected to exceed the prescribed limits, where the work activity is expected to exceed 30 minutes, and to delineate regulated areas.
- Barricades may be placed at doorways, aisles, etc. for administrative ease but in all cases should be located such that adequate warning is given in order for individuals to take proper protective precautions.
- Barricades should be utilized when and wherever employees are required to wear protective equipment.

DUP 1011008

- Warning signs should be attached to barricades warning of the health hazards of asbestos.
- Each time sampling is required, both 8H-TWA and ceiling samples should be taken. For OSHA compliance with ceiling exposures use 15 minute sampling during the phase of the job with the highest expected exposure.
- Record Retention
 - Exposure Records - 30 years minimum
 - Medical Records - 40 years after termination
- Employees should be informally notified of their exposure. In cases of over-exposure, notify in writing as soon as practicable but in no case later than 5 days after the finding.
- Asbestos fiber counting should be performed by an AIHA accredited laboratory.

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