FILE NAME: US Government Contractor Regulations Including Shipyard Regulations (GCR)

DATE: 1981

DOC#: GCR005

DOCUMENT DESCRIPTION: Memo RE Revised USAP Policy on the Use of Asbestos-Containing Materials with Attachment

PLAINTIFF'S EXHIBIT
UC-3014

UNION CARBIDE **INTERNAL CORRESPONDENCE**

MINING AND METALS DIVISION • P. O. BOX K, KING CITY, CALIFORNIA 93930

To (Name) R. E. Byrne
Division Metals Division
Location Niagara Falls, NY

Date September 23, 1981
Originating Dept.
Answering letter date

Copy to W. C. Thurber ✓

Subject USAF Policy

① xc GML HBR G-1 ② file

Per our discussion last week, attached is a copy of the revised USAF policy on the use of asbestos-containing materials. (It is essentially the same as that "suggested" by AIA/NA.) We are hoping the USN will do something similar.

You will note that they make a clear distinction between friable and non-friable materials, which could obviously be very valuable for our business. The important sentence is in the last paragraph of the policy: "When an asbestos-containing material is clearly superior in performance and cost, and the health and safety hazards are minimal, then the selection of the asbestos-containing material is warranted."

This sounds like it was written specifically for our RG applications, and I think you should make sure that sales personnel, distributors (foreign and domestic), "reluctant" customers, etc. are aware of the policy and the quoted sentence, which would even apply to drilling mud and almost all of our applications. I would suggest you even go back to General Motors, Ford, RCI, Interplastic, etc., etc. I talked to Bill Krebs of GMC and a guy from Ford, and both were pleasantly surprised by the new policy. Maybe Jack Walsh can work on Uvalde with this.

Good luck with it.

John L Myers

/dm

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ROUTINE
R 3017002 JUL 81
FM HQ USAF BOLLING AFB DC//LEEE//
TO AIG 9411//DAPD/DE//
RUVKAMA/AFMSC BROOKS AFB TX//SGSF//
RUWTNDA/USAFRGNCIVILENGR DALLAS TX//CR//
RUCLHTA/USAFRGNCIVILENGR ATLANTA GA//ER//
RUWMBHA/USAFRGNCIVILENGR SAN FRANCISCO CA//NR//
INFO RUEAMQA/1947 ASG WASH DC//DA$JL//
ZEN HQ USAF BOLLING AFB DC//DAFD/DADPL//
RUEAHQA/HQ USAF WASH DC//LEE/LEEX/LEEE/LEEES//
RUCIFGA/AFESC TYNDALL AFB FL//CC/DEE//
BT

UNCLAS E F T O
SUBJECT: INTERIM MESSAGE CHANGE 81-2 TO AFM 89-15, 8 JAN 75.
1. THE CHANGE IS A CLARIFICATION OF CRITERIA PROVIDED BY IMC 80-4 CONCERNING THE USE OF BUILDING MATERIALS CONTAINING ASBESTOS.
2. IMC 80-4, PARAGRAPH 2., ADDED A NEW PARAGRAPH 1-38.1 TO AFM 88-15, PAGE 1-13, PARAGRAPH 1-38.1 IS HEREBY REVISED TO READ AS FOLLOWS:
1-38.1. POLICY ON THE USE OF BUILDING MATERIALS CONTAING ASBESTOS. SCIENTIFIC STUDIES HAVE SHOWN THAT THE INHALATION OF AIRBORNE ASBESTOS FIBERS AT LEVELS IN EXCESS OF THE PERMISSIBLE WORKER EXPOSURE LIMITS ESTABLISHED IN THE CURRENT OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION STANDARD (29 C.F.R. S 1910.1001) MAY POSE A POTENTIAL HEALTH HAZARD. SINCE THE USE OF SOME ASBESTOS-CONTAINING CONSTRUCTION MATERIALS MAY UNDER SOME CIRCUMSTANCES RESULT IN EXCESSIVE EXPOSURE TO CONSTRUCTION AND MAINTENANCE PERSONNEL AS WELL AS TO BUILDING OCCUPANTS: THE FOLLOWING POLICY IS ESTABLISHED:
A. FRIABLE ASBESTOS-CONTAINING MATERIALS. FRIABLE ASBESTOS-CONTAINING MATERIALS ARE THOSE IN WHICH ASBESTOS FIBERS ARE LOOSELY BOUND AND WHICH ARE EASILY CRUMBLED OR PULVERIZED, SUCH AS AIR-CELL ASBESTOS THERMAL INSULATION AND SPRAYED-ON ASBESTOS MATERIALS. FRIABLE ASBESTOS-CONTAINING MATERIALS PRESENT PERHAPS THE MOST SERIOUS POTENTIAL HAZARD, ESPECIALLY IN "RIP-OUT" AND DEMOLITION OPERATIONS. ACCORDINGLY:
(1) PLANS AND SPECIFICATIONS FOR ALL NEW CONSTRUCTION AND MODIFICATION PROJECTS WILL BE REVIEWED TO IDENTIFY THE CONTEMPLATED USE OF FRIABLE ASBESTOS-CONTAINING MATERIALS. THE BIOENVIRONMENTAL ENGINEER SHOULD BE NOTIFIED IN WRITING OF ALL PROJECTS INVOLVING THE USE OF SUCH MATERIALS.
(2) SPRAY APPLICATION OF ASBESTOS OR ASBESTOS-CONTAINING MATERIALS TO EXPOSED WALLS, CEILINGS, DUCTS, COLUMNS, ETC., IS PROHIBITED.
(3) SPRAY APPLICATION OF THESE MATERIALS TO SURFACES WHICH ARE NORMALLY COVERED BY WALLS, CEILINGS, OR SIMILARLY PROTECTED FROM DIRECT CONTACT, IS ACCEPTABLE, PROVIDED THAT THESE SPRAY-ON COATINGS DO NOT CONTAIN MORE THAN ONE PERCENT ASBESTOS ON A DRY-WEIGHT BASIS. AREAS WHERE SUCH COATINGS ARE APPLIED MUST BE IDENTIFIED IN REAL PROPERTY RECORDS AND BIOENVIRONMENTAL ENGINEERING CASE FILES SO THAT PROPER PRECAUTIONS MAY BE TAKEN DURING MAINTENANCE OR DEMOLITION ACTIVITIES.
(4) OTHER FRIABLE ASBESTOS-CONTAINING MATERIALS ARE ACCEPTABLE ONLY IF INDICATED BY A SUBSTITUTION STUDY CONDUCTED IN ACCORDANCE WITH PARAGRAPH C. HEREIN.
(5) IN MAINTENANCE, MODIFICATION OR DEMOLITION ACTIVITIES WHERE EXPOSURE TO ASBESTOS DUST FROM PREVIOUSLY-INSTALLED FRIABLE ASBESTOS-CONTAINING MATERIALS MAY OCCUR, ALL AVAILABLE PRECAUTIONS, INCLUDING THE USE OF WORK PRACTICE, RESPIRATORY PROTECTION, AND INDUSTRIAL HYGIENE REQUIREMENTS OF CURRENT OSHA AND

FEDSIM...ACT 1
AFDSC...ACT 1
AFIS VIA IN...ACT 1
1947ASG...INFO 2

HQ USAF 9
ACTION: 1947ASG(5) DA(1) (A,F)
INFO LEE(2) FILE CY(1)

MCN=81212/02011 TOR=81212/0136Z TAD=81212/0210Z CDSN=MAP615

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EPA REGULATIONS (29 C.F.R. S 1910.1001; 40 C. F. R. S 61.20) SHOULD BE STRICTLY ENFORCED.

B. NON-FRIABLE ASBESTOS CONTAINING MATERIALS. NON-FRIABLE ASBESTOS-CONTAINING MATERIALS ARE THOSE IN WHICH ASBESTOS FIBERS ARE "LOCKED-IN" OR "ENCAPSULATED" BY A MATRIX MATERIAL, SATURANT, IMPREGNANT OR COATING. NON-FRIABLE ASBESTOS-CONTAINING MATERIALS DO NOT RELEASE AIRBORNE ASBESTOS FIBERS DURING ROUTINE HANDLING AND END-USE. SOME NON-FRIABLE ASBESTOS-CONTAINING PRODUCTS, INCLUDING MASTICS AND BLACK LINE PRODUCTS, MECHANICAL PACKINGS, OIL SEALS, COMPRESSED GASKETS, SEALANTS AND CAULKS, AND ELECTRICAL INSULATING PAPER, DO NOT RELEASE AIRBORNE ASBESTOS FIBERS IN EXCESSIVE QUANTITIES UNDER ANY REASONABLY FORESEEABLE CIRCUMSTANCE. OTHER NON-FRIABLE ASBESTOS-CONTAINING MATERIALS, INCLUDING ASBESTOS-CEMENT (A-C) PIPE, A-C SHEETS, RESILIENT FLOOR COVERINGS, AND ROOFING FELTS, MAY PRODUCE EXCESS DUST LEVELS DURING CERTAIN UNCONTROLLED ABRADING, SANDING, CUTTING, MACHINING, REMOVAL OR DEMOLITION OPERATIONS, BUT WILL NOT DO SO IF CORRECT WORK PRACTICES ARE EMPLOYED. ACCORDINGLY:

(1) PLANS AND SPECIFICATIONS FOR ALL NEW CONSTRUCTION AND MODIFICATION PROJECTS WILL BE REVIEWED TO IDENTIFY CONTEMPLATED OPERATIONS IN WHICH NON-FRIABLE ASBESTOS-CONTAINING MATERIALS WILL BE ABRADED, SANDED, CUT, MACHINED, REMOVED, ETC. THE BIOENVIRONMENTAL ENGINEER SHOULD BE NOTIFIED IN WRITING OF ALL PROJECTS INVOLVING SUCH OPERATIONS.

(2) SUCH OPERATIONS SHALL PROCEED ONLY IN ACCORDANCE WITH SPECIFIED WORK PRACTICES WHICH ARE KNOWN, OR HAVE BEEN SHOWN, TO PREVENT EXCESSIVE EXPOSURES TO ASBESTOS DUST. WHERE APPROPRIATE, DATA SHALL BE REQUESTED FROM THE MANUFACTURER DOCUMENTING THE EFFECTIVENESS OF RECOMMENDED WORK PRACTICES IN PREVENTING EXCESSIVE EXPOSURES.

(3) WHERE A NON-FRIABLE ASBESTOS CONTAINING PRODUCT CANNOT BE USED CONSISTENT WITH CURRENT OSHA PERMISSIBLE EXPOSURE LIMITS, OR WHERE MANUFACTURER DATA DOCUMENTING THE EFFECTIVNESS OR RECOMMENDED WORK PRACTICES HAS BEEN REQUESTED BUT NOT SUPPLIED, THE USE OF SUCH PRODUCT IS ACCEPTABLE ONLY IF INDICATED BY A SUBSTITUTION STUDY CONDUCTED IN ACCORDANCE WITH PARAGRAPH C. HEREIN.

C. SUBSTITUTION STUDIES. WHERE REQUIRED BY PARAGRAPH A. OR B. HEREIN, PLANS AND SPECIFICATIONS FOR NEW CONSTRUCTION AND MODIFICATION PROJECTS WILL BE REVIEWED TO INSURE THAT CONSIDERATION IS GIVEN TO THE USE OF ASBESTOS-FREE MATERIALS. THIS REVIEW SHOULD COMPARE THE COSTS, PERFORMANCE CHARACTERISTICS, AND EXISTING AND POTENTIAL HEALTH AND SAFETY HAZARDS WHICH MAY RESULT FROM THE USE OF EACH TYPE OF MATERIAL. WHEN AN ASBESTOS-CONTAINING MATERIAL IS CLEARLY SUPERIOR IN PERFORMANCE AND COST, AND THE HEALTH AND SAFETY HAZARDS ARE MINIMAL, THEN THE SELECTION OF THE ASBESTOS-CONTAINING MATERIAL IS WARRANTED. HOWEVER, WHEN AN ASBESTOS-FREE MATERIAL WITH NON-HAZARDOUS CHARACTERISTICS AND COMPARABLE PERFORMANCE AND COST IS AVAILABLE, THE SELECTION OF THE ASEBESTOS-FREE MATERIAL IS INDICATED. IN SITUATIONS WHERE THE APPROPRIATE SELECTION OF MATERIALS IS NOT READILY APPARENT, SELECTION WILL BE MADE BASED ON SOUND ENGINEERING PRINCIPLES AFTER A DETAILED ANALYSES OF ALL FACTORS ASSOCIATED WITH EACH ALTERNATIVE.

BT