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Excursion Limit

SAFETY & HEALTH BULLETIN

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TO Industrial Hygiene Mailing List

FROM Corporate Industrial Hygiene

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DATE October 21, 1988



SUBJECT

OSHA Asbestos Excursion Limit

OSHA recently published an amendment to its asbestos standards, 29 CFR 1910.1001 (General Industry) and 29 CFR 1926.58 (Construction) which sets an excursion limit of 1 fiber/cc of air over a sampling period of 30 minutes. The purpose of this Safety & Health Bulletin is to outline the requirements of the amendments and to inform Goodyear plants what action is required on their part. Previous Safety & Health Bulletins concerning asbestos are as follows:

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| 1. January 31, 1983 | Asbestos Exposure from Motor Brakes |
| 2. February 4, 1983 | PPE - Asbestos Removal |
| 3. April 19, 1985 | Asbestos Handling and Disposal Training Program |
| 4. July 30, 1986 | OSHA Revised Asbestos Standard |
| 5. November 3, 1986 | Asbestos Handling and Disposal Training Program |
| 6. January 8, 1987 | Revised OSHA Asbestos Standards (Superseded by #7) |
| 7. February 23, 1988 | Asbestos Standard Update |

SUMMARY

The excursion limit (EL) of 1 fiber/cc of air is a standard that must be met in addition to the eight hour TWA limit of 0.2 fibers/cc of air. The EL is determined by taking one or more 30 minute air samples. The basic requirements of the amendments to the asbestos standard are as follows:

Monitoring: As with the asbestos standard, initial and periodic monitoring is required.

Regulated Areas: Any area that exceeds the EL must be designated a regulated area and demarcated with barriers. Respiratory protection is required for anyone entering a regulated area.

Hygiene Facilities: Clean change rooms and shower facilities are required when the EL is exceeded.

Protective Clothing: As with the asbestos standard, full body covering, head coverings, foot coverings and gloves are required for asbestos removal operations.

Communication: The training requirements are the same as the asbestos standard. Refer to the February 23, 1988 Safety & Health Bulletin.

Medical Surveillance: A comprehensive program is required by the construction standard for employees exposed above the EL for 30 or more days a year.

PLANT REQUIREMENTS

Because of the type of asbestos removal/renovation operations within Goodyear plants, the excursion limit is of concern. To ensure compliance with the amendments to the asbestos standard, plants must initiate the following procedures:

1. As before, for those plants involved in small scale, short duration asbestos removal operations, personal air monitoring must be conducted each time an employee is involved in asbestos work. Now, however, a 30 minute sampling period is required. To obtain reliable results, a flow rate of 2 liters/minute must be used. Because most asbestos operations in Goodyear plants are relatively short duration, this sampling strategy should not be a problem.

If the operations last longer than 30 minutes, but less than two hours, one or two 30 minute samples are required during those times when the highest exposures are expected. Each sample should be submitted on a separate F-22.

For operations lasting longer than two hours, both a 30 minute and a TWA (eight hour) sample are required. This can be accomplished by having the employee wear two pumps, one for a 30 minute sample and one for an eight hour sample. The 30 minute sample should be taken during the course of the operation at a time when higher exposures are expected. Submit each sample on a separate F-22.

Remember: Use a flow rate of 2 liters/minute for the 30 minute sample.

2. To prevent the need for complete hygiene facilities, regulated areas which may include the use of plastic barriers and a comprehensive medical surveillance program, it is important that employees strictly adhere to accepted asbestos removal practices. This includes the use of wet removal procedures and clean-up with a HEPA vacuum. The use of glove bags is strongly recommended. If the EL is consistently exceeded, glove bags will be required if not already in use.

Insert this Safety & Health Bulletin in Section "C" of your Corporate Industrial Hygiene Policies & Practices Manual. If you have any questions, please contact Corporate Industrial Hygiene.

J L Holtshouser
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Corporate Industrial Hygiene

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