

November 1992

IN RE: ABRAMS

April 17, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard M. Dayoub
U. S. Department of Labor
Occupational Safety & Health Administration
Jacksonville Area Office
Suite 303
3100 University Boulevard, South
Jacksonville, FL 32216

Re: Notice of Alleged Health Hazards,
Westinghouse Electric Corporation

Dear Mr. Dayoub:

This is in response to your letter, dated April 6, 1989, concerning operations at the Westinghouse Electric Corporation facility pertaining to a Notice received by you on March 7, 1989. The specific allegations identified in your letter and our response to each is as follows:

1. Allegation: Employees were exposed to asbestos materials while removing "wedges" from an electrical generator, 29 CFR 1910.1001(c).

Response: Employers must ensure that they do not expose their employees to asbestos in excess of 0.2 fiber per cubic centimeter of air as an eight-hour time-weighted sample. Westinghouse has evaluated the wedge in similar operations, and there was no reasonable expectation that these employees would be exposed to levels of asbestos in the air at or above



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the action level. These wedges are composed of a resin matrix and are very hard and non-friable. In addition, we have taken air samples during similar operations to confirm our opinion on this material. For example:

Westinghouse I.H. No.	Sample Date	Sample Type	Sample Time (Min.)	Fibers 5u/cm3
9593	12/8/83	Personnel	235	0.010
9595	12/9/83	Personnel	150	0.020
9597	12/9/83	Personnel	225	0.020
9598	12/9/83	Personnel	160	0.041
9599	12/9/83	Personnel	190	0.020
9606	12/10/83	Personnel	410	0.005

A full-shift personnel air sample was collected on March 7, 1989, to characterize the operation in question. The stator builder C removed the wedges during this work shift and also engaged in cleanup operations related to the removal of the wedges from the stator (Clayton Laboratory Sample No. 718060). The TWA phase contrast microscopy results of 0.019 fibers greater than 5u/cm3 indicate an exposure that is well below the OSHA action limit for asbestos, which is 0.10 fibers greater than 5u/cm3 as a TWA exposure.

2. Allegation: Employees were not provided personnel protective equipment, such as respirators, coveralls while removing "wedges" where asbestos was present, 29 CFR 1910.1001(g) & (h).

Response: Our historical and current data clearly indicate that there is no exposure above the action level set forth in 29 CFR 1910.1001 and that this area was not a regulated area as defined in the regulations. Therefore, the regulations do not require that respirators, coveralls or other protective equipment be provided.

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We believe that the above information clearly shows that there are no health hazards as alleged. If you have any questions on the foregoing, please contact me.

Very truly yours,

Who will sign?

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1556o/4

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