



Bell Laboratories

Subject: Specifications for
Asbestos Removal -
Case 48102-1

date August 24, 1981

from W. W. Crawford
MH 78691
3A-213 x2250

Mr. S. Eichinger:

This memorandum is in response to your request for a description of procedures required of contractors removing asbestos. OSHA 1910.1001 specifies the following:

. (c)(2)(i) - Insofar as practicable, asbestos shall be.. removed... or otherwise worked in a wet state sufficient to prevent the emission of airborne fibers... . [For example, workers should continually mist or spray the layers of insulation with water as they are being removed.]

. (c)(2)(iii) - Employees engaged in... the removal or demolition of asbestos insulation or coverings shall be provided with respiratory equipment... and with protective clothing. [Generally the workers will wear disposable coveralls including a hood. Respirators will be NIOSH/MSHA approved and be marked accordingly. The contractor supplies protective equipment.]

. (g)(1)(i) - Caution signs shall be provided and displayed at each location where airborne concentrations of fibers may be in excess of exposure limits... . Signs shall be posted at such a distance from such a location so that an employee may read the sign and take necessary protective steps. [Work areas should be roped off and signs posted to prevent BTL personnel from entering the work area.]

. (g)(2)(i) - Caution labels shall be affixed to... scrap, waste, debris, and other products containing asbestos fibers.... [A sample of this type of label is attached.]

. (h)(1) All places of employment shall be maintained free of accumulations of asbestos fibers... . [Work areas should be enclosed within plastic drapes. Floors should also be covered. All enclosure materials should be removed by the contractor. Contractors should vacuum all work areas clean. Only a vacuum cleaner with a HEPA filter, which will remove 99.97% of particles with a diameter 0.3um or greater is acceptable.]

PLAINTIFF'S EXHIBIT

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Mr. S. Eichinger - 2

. (h)(2) Asbestos waste, debris, bags and asbestos-contaminated clothing consigned for disposal... shall be collected and disposed of in sealed, impermeable bags or other closed impermeable containers.

In addition to OSHA requirements, the contractor is responsible as generator of the asbestos waste to manifest the waste and insure that it is taken to an approved landfill. The contractor should supply the name of the disposal facility to BTL. BTL should investigate to insure that the facility is EPA registered and that the contractor manifests the waste material as a hazardous waste under RCRA, number U-013.

The contractor should be certified in asbestos removal by the New Jersey Division of Building and Construction.

Finally, the Environmental Health and Safety Department is available to assess contractor work practices to insure compliance with OSHA regulations and monitor BTL employees potentially exposed to airborne asbestos.

W. W. Crawford

MH-78691-MWC-mrl

W. W. Crawford

Copy to
M. H. Brown
L. K. Jurskis
D. Rainer
W. J. Schreiber
G. M. Wilkening
P. E. Wyszowski

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