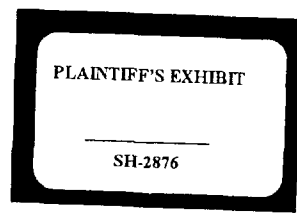


TCR - asbestos



SHELL OIL COMPANY
WOOD RIVER MANUFACTURING COMPLEX
Interoffice Memo

TO: J. A. DEETER
FROM: W. M. CUNNINGHAM
SUBJECT: ASBESTOS REQUIREMENTS-INCIDENTAL HANDLING
DATE: MAY 6, 1986

JIM,

In response to your question regarding the requirements for training and medical surveillance for employees involved in incidental removal of asbestos containing insulation, let me offer the following guidance.

MEDICAL SURVEILLANCE REQUIREMENTS.

The current guidelines require medical surveillance for employees exposed to 0.1 f/cc 8hr TWA or more for one day per quarter. (For purpose of medical surveillance no credit is taken for respirators). As you can see the key is to keep exposure below the 0.1 level.

Our experience to date would indicate that incidental asbestos removal (incidental is defined as roughly 15 min) with proper wet down and cleanup procedures would create exposures below 0.1 f/cc 8hr TWA.

It is therefore not likely that medical surveillance would be necessary. We would suggest monitoring several typical tasks so verify our judgement.

TRAINING REQUIREMENTS

If exposure is below permissible levels, no training would be required by OSHA. However, to maintain the low levels, crafts need to understand and use proper procedures.

Training should focus on the procedures. Explanation of health effects from overexposure would also be prudent to help with motivation to follow the procedures.

We have two video aids. One is the Shell audiscan

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which runs for about 15 minutes and the other is a videotape which goes about 45 minutes. Both cover health effects and good work practices. One of these coupled with a review of the Insulator kit and a discussion of the asbestos P.M. which describes incidental removal and proper procedures would seem appropriate training.

Annual training would not be mandated since exposure levels are low, so the frequency would be a matter of good judgement to assure ourselves the proper practices were being carried out.

WMC

cc:TLR
HGR

LAM 019505

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