RETURN TO: kjk
STANDARDS SECTION - DESIGN DIVISION
ENGINEERING DEPARTMENT
WILMINGTON, DELAWARE

DATE September 11, 1972
SERIAL LETTER 4013
RETURN TO STANDARDS SECTION BY
October 16, 1972

SUBJECT: S4T - ASBESTOS DUST EXPOSURE, MEASUREMENT AND CONTROL
(Second review)

A standard must reflect a "minimum essential" installation. A "minimum essential" standard is one that places primary emphasis on the lowest cost facility, in terms of both initial installed and continuing cost, consistent with reasonable safety and return on investment considerations. "Continuing cost" includes all costs associated with maintaining and operating the facility, including such indirect costs as lost profits resulting from unreasonable outages.

Please direct your comments accordingly.

1. ☐ Approved
2. ☒ Approved with comments or suggestions given below
3. ☐ Noted - Not qualified to comment
4. ☐ Disapproved for reasons noted below

Comments (Please print clearly. To help subcommittee, be specific. Provide examples, reasons, give suggested rewording, etc)

3.4.2 This section specifies that supplied-air or self-contained respirato ~~shall be worn by employees engaged in dismantling asbestos insulation~~. This assumes that permissible TWA exposure limits are automatically exceeded on all dismantling operations and hence, respiratory protective devices are automatically necessary.

We believe Section 3.4.2 should be amended to specify that respirato protection shall be worn on asbestos insulation dismantling operations anytime the asbestos dust concentration cannot be controlled below permi sible TWA exposure ceiling limits by dampening with water or other suitable means.

4.2 This section is not very clear. What does"--- and be required to do s ---" refer to? Some amplification appears in order for clarity.

6.4 Is there sound justification for including an unexposed filter for analysis along with each completed sample? This doubles sample analysis costs and further loads up analysis technicians resulting in even slower return of analysis results.

This standard might be referred to 0 5 (10 25) 50 75 100 ____ times per year.

SIGNED J V Bellamy PLANT OR DEPT Belle Plant DATE 9-20-72

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