PLAINTIFF'S EXHIBIT

ATT-359

AT&T Bell Laboratories

subject: Comments on "Operations Procedure for Asbestos Removal"

date: May 10, 1984

from: C. P. Lichtenwalner
MH 77621
1F-110 X5399

H. R. Fitch:

With regard to your April 3, 1984, Memorandum for Record on "Operations Procedure for Asbestos Removal" we have noted several areas that were not addressed that we feel are essential to assure employee health and compliance with regulatory requirements.

1. Protective clothing should be worn to prevent contamination of personal clothing and dispersion of asbestos-containing debris throughout the building and to the homes of the employees.

2. All respirators used must have NIOSH/MSHA approval for asbestos-containing dusts.

3. Any wastes containing asbestos must be sealed in impermeable containers, appropriately labelled, and disposed of in an approved landfill. Waste manifests and landfill receipts must be retained to verity compliance with EPA regulations.

4. Procedures should specify removal of respirators as final step of work operations.

5. Meticulous clean-up of any work area is required to prevent dispersion of asbestos. We recommend covering work area with disposable plastic drop cloths (to be removed as asbestos contaminated waste) and subsequent vacuuming of area with a HEPA filter equipped vacuum cleaner restricted in use for asbestos operations.

6. An asbestos program manager should be appointed to oversee all asbestos jobs including pre-survey and post-survey checkout of all work.

7. Occupants and all other personnel not wearing respirators and protective clothing must be restricted from areas while work is proceeding.

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8. If work is being performed in an area used as part of the supply or return air, the fans should be shut down, the area sealed, or the work performed out-of-hours during minimal occupancy of the building.

9. Representative work operations should be monitored to assess exposure levels.

10. All individuals performing work requiring disturbance of asbestos-containing materials must be trained in:
    a. proper removal procedures,
    b. proper use of respirators, and
    c. hazards of asbestos.

11. Any work involving removal of more than 260 lineal feet of pipe or more than 160 ft^2 of surface area requires notification of EPA (and probably other regulatory agencies.)

You may want to consider the attached "Procedures for Work Requiring Handling or Disruption of Asbestos-Containing Materials" which has been developed as a guideline for work operations with slight or minimal disruption of asbestos-containing material.

If you need any further information please let us know.

Sincerely,

P. A. Buggins

C. P. Lichtenwalner 5/13/84

MH-77621-CPL-jve

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