PLAINTIFF'S EXHIBIT

CAP-1186

Public Affairs Committee

J. F. Welch/ajb

J. F. Welch, Director, Public Affairs

August 18, 1981

U.S. Air Force Policy - Use of Asbestos Containing Materials

REF: JFW correspondence, same title, July 29, 1980.

ACTION REQUIRED: **Review for information and dissemination**

Enclosed is a clarification of Interim Message Change 80-4, "Use of Asbestos Containing Materials," issued June 11, 1979. The revisions were effected by meetings between Air Force officials, AACPP Staff, Johns-Manville Corporate Marketing Services representatives, and language prepared by Kirkland & Ellis, AIA/NA and AACPP.

In contrast to Message Change 80-4, the revised policy states specifically that A/C pipe is a "non-friable asbestos containing material." Moreover, the criteria for substituting non-asbestos containing products for asbestos containing products are far less onerous than the previous version. Substitution is now linked to whether or not the asbestos-containing product can be used in accordance with work practices known to prevent excessive exposures. This should have far less market impact than the previous language which provided that asbestos free products should be specified "whenever possible".

Staff Recommendations

It is recommended that A/C pipe sales engineers be familiar with these changes as they may affect the specification of A/C pipe by Air Force Engineering Commands and the Corp of Engineers.

If you have any questions, please do not hesitate to call.

JFW/ajb

Enclosures

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ROUTINE
R 301700Z JUL 81
FM HQ USAF BOLLING AFB DC//LEEE//
TO AIG 9411//DAPD/DE//
RUVKAHA/AFMSC BROOKS AFB TX//SGSF//
RUWTNDA/USAFRGNCIVILENGR DALLAS TX//CR//
RUCLHTA/USAFRGNCIVILENGR ATLANTA GA//ER//
RUWMBHA/USAFRGNCIVILENGR SAN FRANCISCO CA//WR//
INFO RUEAHQA/1947 ASG WASH DC//DASJL//
ZEN HQ USAF BOLLING AFB DC//DAPD/DADPL//
RUEAHQA/HQ USAF WASH DC//LEE/LEEX/LEEE/LEEES//
RUCIPGA/AFESC TYNDALL AFB FL//CC/DEE//
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UNCLAS E F T O
SUBJECT: INTERIM MESSAGE CHANGE 81-2 TO AFM 88-15, 8 JAN 75.
1. THE CHANGE IS A CLARIFICATION OF CRITERIA PROVIDED BY IMC 80-4 CONCERNING THE USE OF BUILDING MATERIALS CONTAINING ASBESTOS.
2. IMC 80-4, PARAGRAPH 2., ADDED A NEW PARAGRAPH 1-38.1 TO AFM 88-15, PAGE 1-13, PARAGRAPH 1-38.1 IS HEREBY REVISED TO READ AS FOLLOWS:
1-38.1. POLICY ON THE USE OF BUILDING MATERIALS CONTAING ASBESTOS. SCIENTIFIC STUDIES HAVE SHOWN THAT THE INHALATION OF AIRBORNE ASBESTOS FIBERS AT LEVELS IN EXCESS OF THE PERMISSIBLE WORKER EXPOSURE LIMITS ESTABLISHED IN THE CURRENT OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION STANDARD (29 C.F.R. S 1910.1001) MAY POSE A POTENTIAL HEALTH HAZARD. SINCE THE USE OF SOME ASBESTOS-CONTAINING CONSTRUCTION MATERIALS MAY UNDER SOME CIRCUMSTANCES RESULT IN EXCESSIVE EXPOSURE TO CONSTRUCTION AND MAINTENANCE PERSONNEL AS WELL AS TO BUILDING OCCUPANTS: THE FOLLOWING POLICY IS ESTABLISHED:
A. FRIABLE ASBESTOS-CONTAINING MATERIALS. FRIABLE ASBESTOS-CONTAINING MATERIALS ARE THOSE IN WHICH ASBESTOS FIBERS ARE LOOSELY BOUND AND WHICH ARE EASILY CRUMBLED OR PULVERIZED, SUCH AS AIR-CELL ASBESTOS THERMAL INSULATION AND SPRAYED-ON ASBESTOS MATERIALS. FRIABLE ASBESTOS-CONTAINING MATERIALS PRESENT PERHAPS THE MOST SERIOUS POTENTIAL HAZARD, ESPECIALLY IN "RIP-OUT" AND DEMOLITION OPERATIONS. ACCORDINGLY:
(1) PLANS AND SPECIFICATIONS FOR ALL NEW CONSTRUCTION AND MODIFICATION PROJECTS WILL BE REVIEWED TO IDENTIFY THE CONTEMPLATED USE OF FRIABLE ASBESTOS-CONTAINING MATERIALS. THE BIOENVIRONMENTAL ENGINEER SHOULD BE NOTIFIED IN WRITING OF ALL PROJECTS INVOLVING THE USE OF SUCH MATERIALS.
(2) SPRAY APPLICATION OF ASBESTOS OR ASBESTOS-CONTAINING MATERIALS TO EXPOSED WALLS, CEILINGS, DUCTS, COLUMNS, ETC., IS PROHIBITED.
(3) SPRAY APPLICATION OF THESE MATERIALS TO SURFACES WHICH ARE NORMALLY COVERED BY WALLS, CEILINGS, OR SIMILARLY PROTECTED FROM DIRECT CONTACT, IS ACCEPTABLE, PROVIDED THAT THESE SPRAY-ON COATINGS DO NOT CONTAIN MORE THAN ONE PERCENT ASBESTOS ON A DRY-WEIGHT BASIS. AREAS WHERE SUCH COATINGS ARE APPLIED MUST BE IDENTIFIED IN REAL PROPERTY RECORDS AND BIOENVIRONMENTAL ENGINEERING CASE FILES SO THAT PROPER PRECAUTIONS MAY BE TAKEN DURING MAINTENANCE OR DEMOLITION ACTIVITIES.
(4) OTHER FRIABLE ASBESTOS-CONTAINING MATERIALS ARE ACCEPTABLE ONLY IF INDICATED BY A SUBSTITUTION STUDY CONDUCTED IN ACCORDANCE WITH PARAGRAPH C. HEREIN.
(5) IN MAINTENANCE, MODIFICATION OR DEMOLITION ACTIVITIES WHERE EXPOSURE TO ASBESTOS DUST FROM PREVIOUSLY-INSTALLED FRIABLE ASBESTOS-CONTAINING MATERIALS MAY OCCUR, ALL AVAILABLE PRECAUTIONS, INCLUDING THE USE OF WORK PRACTICE, RESPIRATORY PROTECTION, AND INDUSTRIAL HYGIENE REQUIREMENTS OF CURRENT OSHA AND

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AFDSC...ACT 1
AFIS VIA IN...ACT 1
1947ASG...INFO 2

HQ USAF 9
ACTION: 1947ASG(5) DA(1) (A,F)
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EPA REGULATIONS (29 C.F.R. S 1910.1001; 40 C. F. R. S 61.20) SHOULD BE STRICTLY ENFORCED.

B. NON-FRIABLE ASBESTOS CONTAINING MATERIALS. NON-FRIABLE ASBESTOS-CONTAINING MATERIALS ARE THOSE IN WHICH ASBESTOS FIBERS ARE "LOCKED-IN" OR "ENCAPSULATED" BY A MATRIX MATERIAL, SATURANT, IMPREGNANT OR COATING. NON-FRIABLE ASBESTOS-CONTAINING MATERIALS DO NOT RELEASE AIRBORNE ASBESTOS FIBERS DURING ROUTINE HANDLING AND END-USE. SOME NON-FRIABLE ASBESTOS-CONTAINING PRODUCTS, INCLUDING MASTICS AND BLACK LINE PRODUCTS, MECHANICAL PACKINGS, OIL SEALS, COMPRESSED GASKETS, SEALANTS AND CAULKS, AND ELECTRICAL INSULATING PAPER, DO NOT RELEASE AIRBORNE ASBESTOS FIBERS IN EXCESSIVE QUANTITIES UNDER ANY REASONABLY FORESEEABLE CIRCUMSTANCE. OTHER NON-FRIABLE ASBESTOS-CONTAINING MATERIALS, INCLUDING ASBESTOS-CEMENT (A-C) PIPE, A-C SHEETS, RESILIENT FLOOR COVERINGS, AND ROOFING FELTS, MAY PRODUCE EXCESS DUST LEVELS DURING CERTAIN UNCONTROLLED ABRADING, SANDING, CUTTING, MACHINING, REMOVAL OR DEMOLITION OPERATIONS, BUT WILL NOT DO SO IF CORRECT WORK PRACTICES ARE EMPLOYED. ACCORDINGLY:

(1) PLANS AND SPECIFICATIONS FOR ALL NEW CONSTRUCTION AND MODIFICATION PROJECTS WILL BE REVIEWED TO IDENTIFY CONTEMPLATED OPERATIONS IN WHICH NON-FRIABLE ASBESTOS-CONTAINING MATERIALS WILL BE ABRADED, SANDED, CUT, MACHINED, REMOVED, ETC. THE BIOENVIRONMENTA
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ENGINEER SHOULD BE NOTIFIED IN WRITING OF ALL PROJECTS INVOLVING SUCH OPERATIONS.

(2) SUCH OPERATIONS SHALL PROCEED ONLY IN ACCORDANCE WITH SPECIFIED WORK PRACTICES WHICH ARE KNOWN, OR HAVE BEEN SHOWN, TO PREVENT EXCESSIVE EXPOSURES TO ASBESTOS DUST. WHERE APPROPRIATE, DATA SHALL BE REQUESTED FROM THE MANUFACTURER DOCUMENTING THE EFFECTIVENESS OF RECOMMENDED WORK PRACTICES IN PREVENTING EXCESSIVE EXPOSURES.

(3) WHERE A NON-FRIABLE ASBESTOS CONTAINING PRODUCT CANNOT BE USED CONSISTENT WITH CURRENT OSHA PERMISSIBLE EXPOSURE LIMITS, OR WHERE MANUFACTURER DATA DOCUMENTING THE EFFECTIVNESS OR RECOMMENDED WORK PRACTICES HAS BEEN REQUESTED BUT NOT SUPPLIED, THE USE OF SUCH PRODUCT IS ACCEPTABLE ONLY IF INDICATED BY A SUBSTITUTION STUDY CONDUCTED IN ACCORDANCE WITH PARAGRAPH C. HEREIN.

C. SUBSTITUTION STUDIES. WHERE REQUIRED BY PARAGRAPH A. OR B. HEREIN, PLANS AND SPECIFICATIONS FOR NEW CONSTRUCTION AND MODIFICATION PROJECTS WILL BE REVIEWED TO INSURE THAT CONSIDERATION IS GIVEN TO THE USE OF ASBESTOS-FREE MATERIALS. THIS REVIEW SHOULD COMPARE THE COSTS, PERFORMANCE CHARACTERISTICS, AND EXISTING AND POTENTIAL HEALTH AND SAFETY HAZARDS WHICH MAY RESULT FROM THE USE OF EACH TYPE OF MATERIAL. WHEN AN ASBESTOS-CONTAINING MATERIAL IS CLEARLY SUPERIOR IN PERFORMANCE AND COST, AND THE HEALTH AND SAFETY HAZARDS ARE MINIMAL, THEN THE SELECTION OF THE ASBESTOS-CONTAINING MATERIAL IS WARRANTED. HOWEVER, WHEN AN ASBESTOS-FREE MATERIAL WITH NON-HAZARDOUS CHARACTERISTICS AND COMPARABLE PERFORMANCE AND COST IS AVAILABLE, THE SELECTION OF THE ASEBESTOS-FREE MATERIAL IS INDICATED. IN SITUATIONS WHERE THE APPROPRIATE SELECTION OF MATERIALS IS NOT READILY APPARENT, SELECTION WILL BE MADE BASED ON SOUND ENGINEERING PRINCIPLES AFTER A DETAILED ANALYSES OF ALL FACTORS ASSOCIATED WITH EACH ALTERNATIVE.

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