

PLAINTIFF'S
EXHIBIT
DUP-1865

PLEASE DESTROY LETTER OF SEPTEMBER 8, 1983
AND REPLACE WITH THIS ONE. CORRECTIONS
HAVE BEEN MADE.

THANK YOU

DUP 0814296

DU 009772

ACIDS TECHNICAL DIVISION
VICTORIA PLANT

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November 8, 1983

TO: AREA I/H PROPRIETORS
FROM: J. C. WARREN *JCW*

ASBESTOS PERIPHERY MONITORING - ALL ACIDS AREAS

Summary

A program was initiated in January, 1983 to monitor for asbestos at the downwind periphery of insulation removal jobs to determine whether roped off areas for asbestos removal jobs are adequately protecting nearby personnel.

A total of 19 periphery samplings were conducted by the end of June. The results given in Table I show that all of the samples showed asbestos loadings considerably less than the 8 Hr TLV of 2 fibers > 5 micron in length/cc. Therefore, we have concluded that the present method of establishing the location of periphery safety rope marking of asbestos jobs is adequate. No further sampling is planned.

The samples were analyzed by either Haskell Lab or Clayton Environmental Consultants using the standard phase contrast method (NIOSH P&CAM 239).

Documentation

The basic data sheets, laboratory analytical reports and calculations are recorded in Notebook 30947.

This memo with attached table must be incorporated into the area I/H notebook. We suggest that the monitoring data be reviewed with all personnel in your area and be included as a part of the OSH 24 Chronic Hazards Training.

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Monitoring Results

The results of 20 asbestos samplings are given in Table I. Nineteen of the samplings were taken at the periphery and one was taken erroneously at the edge of the building which was app. 55' inside the roped off area. However the "inside the periphery" sample (SE) was also well below the TLV.

Those analyses showing a "less than" number value were limited by the analytical limit of the method (3000 fibers/filter).

JCW:lj
Attachment

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TABLE I

ASBESTOS INSULATION REMOVAL - PERIPHERY MONITORING

Date	Sample* Ident.	Oper. Area	Removal Job	Location of Samples	Dir.	Wind V-MPH	Sampling Hrs.	Sampling Liters	Asbestos Ldg. Fibers >5u/cc
1/25/83	1	2	Stm Valve & Line #1 Conc. Still	8' E of Valve 5' High	Inside Building	0.07	6.4	0.26	
1/31/83	2	5	Process Line-AOP Absorber	25' NE of Line 4' High	SSW	5-10	0.58	52.5	0.10
3/7/83	A	11	Stm. Line-Cent. Org. HUT	20' S of HUT 5' High	N/NNW	10-12	0.33	28.5	<.105
5/28/83	5H	1	Sec. Stripper Column	25' N of Column 4' High	NR	NR	4.0	471	.006
6/4/83	5D	1	Wet Stripper & Topper	150' N of Column 4' High	S	10-15	3.0	270	.011
6/4/83	5I	1	Wet Stripper & Topper	225' N of Column 3rd Floor High	S	10-15	3.0	270	<.011
6/4/83	5L	Nylon	Benzene	60' N of Column 3rd Floor High	S	10-15	3.1	278	<.011
6/5/83	4Z	1	PDHCS Column	75' N of Column 4' High	SE	15	4	360	<.008
6/5/83	5A	1	"	105' W of Column 4' High	SE	15	4	360	<.008
6/10/83	1	1	4 Columns	150' S of Columns 6' High	SE	10	8.5	765	<.0039
6/10/83	2	1	"	75' N of Columns 3' High	SE	10	8.47	762	.0105

<u>Date</u>	<u>Sample* Ident.</u>	<u>Oper. Area</u>	<u>Removal Job</u>	<u>Location of Samples</u>	<u>Dir.</u>	<u>Wind V-MPH</u>	<u>Sampling Hrs.</u>	<u>liters</u>	<u>Asbestos Idg. Fibers >5u/cc</u>
6/10/83	3	1	" "	30' W of Columns 3' High	SE	10	8.57	771	<.0039
6/11/83	4	1	" "	150' S of Columns 6' High	SE	10-12	8.47	761	<.0105
6/11/83	5	1	" "	75' N of Columns 3' High	SE	10-12	8.33	750	<.0053
6/11/83	6	1	" "	55' W of Columns 3' High	SE	10-12	8.47	761	<.0039
6/18/83	16	1	PMD-1 Column	150' N of Column 20' High	SE	5	7.75	837	.0657
6/18/83	17	1	" "	150' E of Column 20' High	SE	5	7.75	884	.0125
6/18/83	18	1	" "	150' N of Column 10' High	SE	5	7.75	930	<.0032
6/27/83	17	16(TF)	DBW Ext TK	37' E of TK 4' High	W	2	2.95	326	<.0092
<u>Inside Periphery Monitoring</u>									
5/28/83	5E	1	Sec. Stripper	20' S of** Stripper 4' High	NR	NR	4.0	499	.0261

* - First 3 Samples Analyzed by Haskell Lab, the Balance by Clayton Environmental Consultants, Inc.

** - Roped Off Area About 75' S of Stripper