

Copies to: W. F. Edmonds, P. D. Folzenlogen, D. G. Pringle,
A. G. Robinson, D. W. Scoggins, R. C. Spillers, G. F. Strobl,
and W. C. Walley - 6-22-88/sha

June 22, 1988

Mr. J. T. Knorpp, Director
Dallas Area OSHA Office - Central Place
1425 West Pioneer Drive, Suite 230
Irving, TX 75061-7181

Reply to Attention of: 72159460

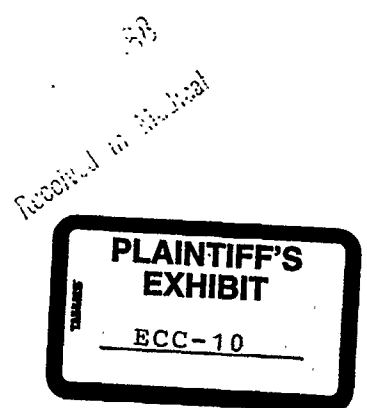
Dear Mr. Knorpp:

This is in response to your letter dated June 7, 1988, stating that an employee alleged "employees are, and have been in the past, exposed to asbestos fibers in pipe insulation works without being fully protected from such exposure."

Texas Eastman Company is fully aware of the requirements of 29 CFR 1910.1001 - Asbestos, Tremolite, Anthophyllite, and Actinolite - and other OSHA regulations. It is our policy to maintain a safe workplace for all our 2,625 employees and comply with all applicable state and federal regulations. In order to achieve that goal, we conduct a comprehensive ongoing occupational medical program supervised by two full-time physicians certified by the American Board of Preventive Medicine, specialty Occupational Medicine. Under their supervision are three industrial hygienists, the senior supervising hygienist being an American Board of Industrial Hygiene certified professional.

Our company maintains procedures covering storage, application, renovation, demolition, and disposal of asbestos materials. These procedures specifically address employee protection including use and maintenance of personal protective equipment, change rooms and handling of contaminated clothing, hazard communication, respirator training and fit-testing, restricted areas, employee exposure monitoring, and medical surveillance.

In 1974 a program was begun to abolish the use of asbestos at Texas Eastman Company. Since that time, no asbestos insulation has been applied in the plant. Renovation and new projects utilize asbestos free materials for insulation which is clearly marked to identify it as such. Asbestos utilization in three of our processes has been discontinued by substitution of asbestos free materials or through process



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improvements. Contractors qualified in handling of asbestos are utilized to remove asbestos insulation and apply asbestos free materials. Therefore, no Texas Eastman employees handle and/or use asbestos containing materials on a routine basis. Employee exposure data collected by our industrial hygiene laboratory reveals that employees are not exposed to airborne levels of asbestos fibers in excess of published standards.

We are aware of only one situation in our plant that might have been of concern. This involved some weathered asbestos insulation covering a large pipe elbow. Several pieces of insulation with a total volume less than one cubic foot fell to the ground from a pipe rack in an outdoor processing location. That particular area is not one of high employee activity, and on discovery, the area was barricaded in accordance with 29 CFR 1910.1001(e) - Regulated Areas, until proper cleanup and disposal was completed by insulation contractors. While the regulated area was present, and during cleanup, both area and personal monitoring was conducted to determine potential employee exposures. Six samples were collected and analyzed by the method outlined in Appendix A of the standard. All were below 0.01 fiber per cubic centimeters of air averaged over an 8-hour period. Meetings have been held with operators and supervisors to review safety procedures and practices relating to asbestos.

Texas Eastman is committed to providing a safe workplace for employees. No individual is expected to discharge his or her duties in an unsafe environment or manner. Programs are in place to evaluate and correct potential problems. These programs do not reveal that employees are exposed to asbestos without being fully protected from such exposures.

Thank you for the opportunity to respond to these allegations.

Yours very truly,

J. O. Nethery
T. O. Nethery
President

tst