PLAINTIFF'S EXHIBIT

CHV-877

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Memorandum

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San Francisco, CA
September 16, 1986

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REMOVING VINYL-ASBESTOS TILE

MR. R. W. COUVILLION:

In reference to the telephone conversations on September 12 and 15 among Messrs. K. J. Finley, N. C. Zeiser, R. T. Cheng, and yourself, we understand that an office modification job is currently in progress which calls for the removal of 10,000 to 15,000 square feet of vinyl-asbestos floor tile and its replacement with carpet. Test results indicate that the floor tile contains 5 to 15% asbestos. This memo is in response to your request for our comments on proper work procedures required to avoid health hazards to workers.

Although there is 5 to 15% asbestos in the vinyl-asbestos tile, the asbestos fibers are bound tightly with PVC plastic during the tile manufacturing process so that they become virtually inseparable by ordinary mechanic force. In fact, the laboratory which did the asbestos analysis had to first grind up the submitted tile sample into fine granules. Next, they burned off the organic portion (PVC plastic) in an ashing oven. Then it was possible to examine the sample residue for asbestiform minerals by polarized-light microscopy.

There is no specific OSHA requirement related to the handling of vinyl-asbestos tiles. Basically, EPA's "Guidance for Controlling Asbestos-Containing Materials in Buildings" is concerned with materials that are "friable". Friable material is defined by EPA as material that can be crumbled, pulverized, or reduced to powder by hand pressure. Handling friable asbestos-containing materials may result in the release of airborne asbestos fibers which can create a potential hazard to workers and other exposed persons.

In our opinion, the vinyl-asbestos tile is definitely not friable. The removal of the old tile by raising and pulling apart with a pry or blade should not cause the release of asbestos fibers. However, to assure dust-free working conditions, we recommend that the tiles and the concrete floor should be kept wet by applying ample quantities of water. If visible dust emission is still unavoidable, then workers should be required to wear an approved respirator, e.g., 3M's EASI-AIR Dual Cartridge Respirator with High Efficiency Filters.

abt 12720 10-14-86

N. C. ZEISER

RTC:oah

cc: [redacted] Cheng
Mr. S. L. Dryden

CHEV
BB 012000