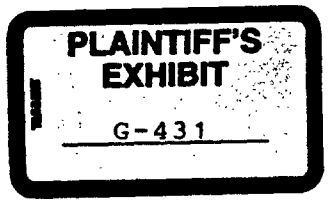
PLAINTIFF'S EXHIBIT
G-431





From : Safety & Health Department
WIN :
Date : May 17, 1979
Subject: AIR SAMPLING
GARLOC MATERIALS
(M42251AB)

To : R. Campbell, Mgr., Material Services O-200

cc: W. A. Davis O-200
~~M. R. Whittington~~ ~~H-100~~

Confirming our telephone conversation:

The air sampling tests for asbestos conducted 4-25-79, in C.E.S.T., of employes cutting and handling Garloc materials are somewhat invalid, due to an OSHA directive issued October 1978. The sampling should have been conducted the entire shift, even when the employes were not actively engaged in handling the materials.

The results of T. Hoppes, #31927, for the 193 minutes sampled, while actively handling the Garloc materials, was 0.10 fibres/cc air. For W. Betton #32374, one cassette with a sample time of 119 minutes showed 0.14 fibres/cc air and the second cassette, with a sample time of 85 minutes showed 0.17 fibres/cc air.

The OSHA permissibile limit (PEL) for asbestos is two (2) fibres/cc of air for an (8) hour period, but the OSHA directive has stated that if the airborne concentrations of asbestos are greater than 0.1 fibres/cc air, the medical requirements must be initiated. Thus, the results obtained from the sampling would justify all employes who would perform this operation, to have the necessary medical examinations.

The sampling should be conducted again, so that a full shift, or at least (7) hours, can be monitored. If possible, hold the garloc requisitions back until a full shift's work on this material is available for sampling.

Notify this department at least (16) hours in advance, so that our sampling equipment can be made ready for the test.

E. J. Flynn

E. J. Flynn
Safety Engineer

Attachment

Discard Date:

MISS. IN RE: ABRAMS, et al. 1993

28001220

PLAINTIFF'S EXHIBIT
7236.0



OSHA PROGRAM DIRECTIVE #300-16
October 11, 1978

TO: REGIONAL ADMINISTRATORS/OSHA

Subject: 29 CFR 1910.1001(j)(2) or (3) or (4), Minimum Airborne Fiber Concentration for Initiating and Continuing Asbestos Medical Examinations.

1. *Purpose*

The purpose of this directive is to provide uniform inspection and compliance procedures for the medical examination requirement in the asbestos standard, 29 CFR 1910.1001(j)(2), or (3) or (4).

2. *Documentation Affected*

This directive supplements and provides reference for the OSHA Industrial Hygiene Field Operations Manual (IHFOM) and the OSHA Field Operations Manual (FOM).

3. *Background*

In 29 CFR 1910.1001(j)(2), or (3) or (4), Medical examinations, the term ". . . exposed to airborne concentrations of asbestos fibers. . . ." has been the subject of considerable discussion and debate as to the meaning or interpretation of "airborne concentrations."

4. *Action*

a. Definition.

In 29 CFR 1910.1001(j)(2), or (3) or (4), Medical examinations, the term ". . . exposed to airborne concentrations of asbestos fibers. . . ." is administratively interpreted to mean exposed to a minimum of 0.1 asbestos fibers longer than 5 micrometers per cubic centimeter of air, as determined by the sampling method prescribed in section 4.c. of this directive. The phrase "fibers longer than 5 micrometers per cubic centimeter of air" shall hereafter be abbreviated as "fibers/cc."

b. Scope and applicability.

Medical examinations as per 29 CFR 1910.1001(j)(2), or (3) or (4) will be required for any 7- to 8-hour time-weighted average concentration of 0.1 fibers/cc, or for a greater concentration.

c. Sampling information.

(1) Sampling procedures will follow Chapter X of the IHFOM., with the additional guidance of 4.c.(2) and (3) of this directive.

(2) Exposure to asbestos dust with low levels of contamination (e.g., mixed with other minerals).

(a) For exposures to dust that is mostly asbestos and is expected to be below the permissible exposure limit, the same filter should be used for the entire shift, but no longer than 8 hours.

(b) For exposures expected to be at or above the permissible exposure limit, several samples may be required during the shift to avoid overloading the filters.

(3) Exposures to asbestos dust with high levels of contamination.

(a) Several samples may be required during the shift to avoid overloading the filter.

(b) Filters should be changed only after a minimum of 1 hour of sampling time for exposures expected to be close to 0.1 fibers/cc. Seven or eight 1-hour samples can be collected during the day.

d. Examples of types of violations.

(1) Where an employer does not provide the required medical examinations, and an employee is exposed to 0.1 or more fibers/cc, it would be considered a "serious" violation of 29 CFR 1910.1001(j)(2), or (3) or (4).

(2) For definitions and guidance on "repeated," "willful," or a "failure to correct" violation, see the FOM, Chapter VIII.

5. *Effective Date*

This directive is effective immediately and will remain in effect until further notice.

ABRAMS et al. v. ENV Natl. 1993

28001221

RECEIVED

MAY 16 1979

SAFETY DEPT.

TO: M. Whittington
cc: E. Flynn

(W) LESTER

Sampled Date - 4-25-79
Analyzed Date - 5- 7-79
Analyzed By - (Phase Light Microscopy)

I.H.#	Cassette No.	Employee's Name	Operation	Sampling Time (min.)	Analyte	Sample Results Fibers/cc
6561	C-14	T. Hoppes	Store keeper	193	Asbestos	0.10
6562	C-18	W. Vetton	Stores attendant	119	Asbestos	0.14
6563	C-17	W. Vetton	Stores attendant	85	Asbestos	0.17

OSHA permissible exposure limit (PEL) is for 2 fibers/cc of air for an 8-hour period, but an OSHA program directive has stated that if airborne concentrations of asbestos are greater than 0.1 fibers/cc, then medical examination requirements must be initiated.

Diane Whittier

Diane Whittier, Industrial Hygiene Engineer
(W) Corporate Industrial Hygiene Laboratory

caz

5/11/79

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