

subject: Environmental Health and Safety
Department Policy on Asbestos
Removal - Case 48097-1

date: October 12, 1981
from: D. Rainer
MH 78691
3A-213 x7512

MEMORANDUM FOR RECORD

INTRODUCTION

Maintenance and repair work on some of the Bell Laboratories Plant facilities has necessitated that on occasion asbestos insulation on pipes, boilers, beams, etc. be manipulated or removed. To assure compliance with all applicable state and federal regulations, the following are recommended:

1. All contractors or Bell Laboratories employees engaged in asbestos handling or removal must comply with the regulations outlined in the Occupational Safety and Health Administration (OSHA) Standard 29 CFR 1910.1001.
2. Disposal of asbestos containing wastes must be handled in accordance with Environmental Protection Agency (EPA) regulations and Resource Conservation Recovery Act (RCRA) regulations.

OSHA Standards

The present OSHA asbestos standard is two asbestos fibers per cubic centimeter of air as an 8-hour Time Weighted Average (TWA). "OSHA Program Directive #300-16," requires that medical examinations be given employees who have asbestos exposures equal to or exceeding 0.1 fibers per cubic centimeter of air as an 8-hour TWA.

Handling Asbestos Containing Insulation

Before working with material that is thought to contain asbestos, the material must be analyzed to determine if it in fact does contain asbestos. It is not possible by visual inspection to ascertain whether or not insulation contains asbestos. If insulation materials are to be analyzed, please contact the Environmental Health and Safety Department for instructions on the correct method of sampling.

LLA 001879

PLAINTIFF'S EXHIBIT

ATT-391

The primary goal when handling asbestos containing material is to minimize employee exposure. Insofar as possible, asbestos should be removed or otherwise worked in a wet state sufficient to prevent the emission of airborne fibers. For example, workers should continually mist or spray the layers of insulation with water if they are being removed.

Employees engaged in the removal or demolition of asbestos insulation or coverings must be provided with respiratory protection and with protective clothing. Generally, workers wear disposable coveralls including a hood. Respirators must be NIOSH/MESHA approved and be marked accordingly.

Caution signs must be provided and displayed at each location when airborne concentration of fibers may be in excess of exposure limits. Signs must be posted at such a distance from the location so that employee may read the sign and take necessary protective steps. Work areas should be roped off and signs posted to prevent inadvertant exposure to personnel not working in the area.

All work areas where asbestos is being manipulated should be enclosed within plastic drapes. Floors should also be covered. Upon completion of the work tasks, all enclosure materials should be removed and disposed of in accordance with the applicable regulations. Any asbestos containing wastes must contain caution labels that are affixed to the bag containing the waste.

After completion of all job tasks work areas should be vacuumed with an approved vacuum cleaner containing a HEPA filter which will remove 99.97% of particles with a diameter of 0.3 micrometers or greater. An alternative to vacuuming is to wet mop the affected area.

CONCLUSIONS

The Environmental Health and Safety Department is available to review contractor work practices and BTL work practices to insure compliance with all applicable regulations. This department is also available to monitor BTL employees who have a potential asbestos exposure or answer any asbestos related questions.



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