ARMCO Armco Steel Corporation

April 26, 1976



To: Safety and Industrial Hygiene List

From: C. Wayne Simpson

Subject: OSHA Asbestos Standard - 1910.93a - Medical Examinations

Subparagraph (j) of the present OSHA asbestos standard requires: "The employer shall provide or make available at his cost, medical examinations relative to exposure to asbestos required by this paragraph." The examinations that are required include preplacement, annual and termination of employment for employees exposed to airborne concentrations of asbestos fibers. Consult 1910.93a(j) for specific requirements.

The Occupational Safety and Health Review Commission has ruled on two separate cases (American Smelting and Refining Company - 3 OSHC 1852 and GAF Corporation - 3 OSHC - 1686) that such medical examinations are required, " . . . . even though the levels of exposure may not exceed those set forth in 1910.93a(b)(1)." This means that annual medical examinations, as well as preplacement and employment termination examinations are mandatory wherever airborne asbestos exposures occur. We are aware also that at least one other steel company has been cited by OSHA for failure to provide medical examination to employees exposed to asbestos, even thoughtthe exposure levels were less than the OSHA limits.

We suggest you review 29 CFR 1910.93a. Determine where asbestos is used or exists in your plants and whether substitute materials are possible. Where asbestos must be used, annual medical examinations, and the other requirements of 1910.93a must be provided.

GWS:kr

C. Wayne Simpson

cc: J. L. Howard
D. P. Klaiber
R. D. Tranter

ARMCO Armco Steel Corporation

Houston-Metallurgy
September 22, 1976

To: Mr. W. M. Rankin

From: H. H. Olson

Subject: Kansas City OSHA Inspection

Attached is a copy of the results of the OSHA type inspection of the Metallurgical Department.

We will start immediately to correct all items that can be taken care of by Metallurgy and request assistance of Maintenance where required.

H. H. Olson

H. H. Olson
Works Metallurgist

mea

Attachment

cc: J. R. Sacks
Burke Huber

PLAINTIFF'S EXHIBIT
ARO-84

FORM C-1110