

3

PLAINTIFF'S
EXHIBIT
GP-15

U. S. DEPARTMENT OF LABOR

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
REGION X

SEATTLE AREA OFFICE

ROOM 1800 SMITH TOWER
900 SECOND AVENUE
SEATTLE, WASHINGTON 98104

January 22, 1973

TO: EMPLOYERS USING ASBESTOS

SUBJECT: Asbestos Hazard Control

GENTLEMEN:

The enclosed package of selected materials is oriented toward the employers' role in developing an asbestos control program.

If you have specific comments, suggestions or questions regarding the asbestos standard, please write them on this sheet and return to the course instructor, or by mail at the above address.

Sincerely,

R. L. Beeson
R. L. Beeson



GEORGIA-PACIFIC
ROUTE 519

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	-----

ASBESTOS HAZARD CONTROL - GENERAL

CHANGING WORK PRACTICES IS A SIMPLE, ECONOMICAL, AND PRACTICAL APPROACH TO CONTROL OF ASBESTOS DUST PRODUCTION

Some recommended practices are :

1. Use plastic waste bags for collection, transportation, and waste disposal of asbestos refuse.
2. Use a portable industrial vacuum cleaner for pick-up of asbestos waste and dust at the work site.
3. Use plastic impregnated paper coveralls and dust respirators for dusty operations of an incidental nature. The coveralls are throw-away and eliminate processing and cleaning.
4. Use downdraft ventilated portable work tables for precutting and assembly of asbestos materials at remote locations, mobile situations or inside ships.
5. Pre-cut all block insulation in shops under ventilated condition and then deliver it to location.
6. Package pre-cut block insulation in plastic and add water to contain dust, to retain integrity of cores, identification, and ease of handling.
7. Reduce airborne asbestos dust 50 to 40 % by prewetting the materials before handling.
8. Mix asbestos cement (10%) at remote locations under ventilated conditions. Mix small batches in plastic bags.
9. Spread plastic or canvas drop cloths at work site to contain and facilitate cleanup.
10. Conduct regular assembly of asbestos materials on piping prior to installation.

EMPLOYER'S ASBESTOS CONTROL PROGRAM CHECK-LIST

The broad requirements of any asbestos control program should include :

- First: Initiate a respirator program immediately to reduce exposures until other control measures can be developed.
 - Second: Identify obvious dusty operations, or potential sources of asbestos dust.
 - Third: Develop capabilities for both personnel and environmental monitoring. Otherwise the exact exposures or dust level ranges are unknown.
 - Fourth: Examine work practices to identify those causing dust production and eliminate, modify, or explore alternate ways.
 - Fifth: Initiate engineering controls that will have a sustained effect; such as, substitution of materials, new methods, ventilation control, isolation, enclosure and dust collection.
 - Sixth: An educational program is necessary to explain program directives, changes of work practices, techniques, and medical requirements.
 - Seventh: Medical programs are now required. Each asbestos worker must be medically and environmentally monitored. Record keeping and availability of the records to both the worker, his physician and to OSHA or NIOSH are embodied in the requirement.
-

11. Consider disposable forms of respiratory protection for onetime or intermittent use situations.
(U.S. Bureau of Mines Approved.)
12. Substitute non-asbestos products whenever suitable, acceptable and feasible.
13. Use enclosures to limit the spread of dust from unit operations.
14. Separate clean-up areas for workmen.
15. Limit exposure of other trades in the vicinity of asbestos work.
16. Develop asbestos work stations, either portable or stationary, to control dust production.
17. Develop suitable storage and storing areas.

Some practices that produce high asbestos dust levels and should be prohibited:

1. Do not clean up fallen asbestos debris with brooms or brushes.
2. Do not allow debris to be thrown from staging or from one deck to another.
3. Do not shake coveralls or drop clothes.
4. Do not remove respirators before asbestos dust laden clothing.
5. Do not clean dusty clothes with an air gun.
6. Do not vent asbestos dust picked up by ventilation into adjoining work areas, or ship compartments.
7. Do not wear respirators covered with asbestos dust.
8. Do not wear street clothes to handle asbestos materials or under known dusty conditions.
9. Do not use asbestos for welders pads.
10. Do not allow uncontrolled cutting, ripping, sawing, or bracking of asbestos in small enclosed spaces.

5

TYPICAL OSHA SAMPLING DATA SHEET

Substance:

Asbestos.

Standard: 29 CFR 1910.106(b), (1) and (3) of June 7, 1972

8-hour time-weighted average: 5 fibers, longer than 5 micrometers, per cubic centimeter of air.

Ceiling concentration: 10 fibers, longer than 5 micrometers, per cubic centimeter of air.

Analytical Method:

Fibers counted at 400-450 Magnification, using phase contrast illumination, with sample mounted in high-viscosity solution of membrane filter material.

Sampling Equipment:

Personal sampling pump plus Millipore type AA Filter (37mm, 0.8u pore size). Face cap is removed and filter used open face during sampling. Sample rate: 2 liters per minute.

Sample Size:

Minimum period of 15 minutes for evaluation of ceiling limit. Several samples of up to 4 hours for evaluation of 8-hour average. Samples with a visible deposit may be too heavy to count. Compare with a clean filter. Heavy concentration of visible dust in the air (100-500 fibers/cc) may require short sampling periods of only 5 minutes, or less.

Blanks:

With each batch of samples submit two filters which are subjected to exactly the same handling as for the samples except that no air is drawn through them. Label these as blanks.

Shipping:

The cassettes in which the samples are collected should be shipped in a suitable container, designed to prevent damage in transit.

Formula used for limit:

$$C = \frac{C_1 T_1 + C_2 T_2 + \dots + C_n T_n}{8}$$

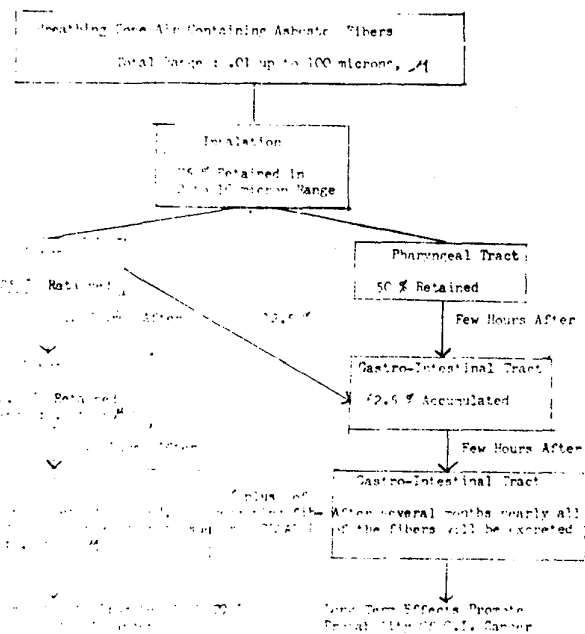
Equivalent exposure for the 8-hour workshift.

C = average concentration for the period T

T = exposure time at concentration C

C = a series of numbered samples and exposure times.

RATE OF INHALED ASBESTOS FIBER



PREDICTED ASBESTOS DUST CONCENTRATIONS

(Taken From Actual Measurements Of Industrial Operations)

<u>Operation</u>	<u>Present</u> <u>Fibers/ml</u>	<u>Improved</u>	<u>Change of Work Practice</u> <u>& Approved Respirator</u>
1. Mixing & Applying Plaster and Gypsum in Plaster Material with Ventilation	2.5	.5	.05
with Ventilation	4.6	1.0	.10
2. Mixing & Applying Plaster Material with Ventilation	5.2	2.5	.30
and Ventilation	11.5	5.0	.50
3. Mixing & Applying Zn Oxide and Linoleum with Ventilation	7.0	1.5	.20
4. Operation of Mixing of Plaster and Gypsum with Ventilation	10	.7	3.0
with Ventilation	10	.1	1.0
5. Operation of Mixing of Plaster and Gypsum with Ventilation	26.70	10	.5
6. Operation of Mixing of Plaster and Gypsum with Ventilation	10	5	1
7. Operation of Mixing of Plaster and Gypsum with Ventilation	10	20	5
8. Operation of Mixing of Plaster and Gypsum with Ventilation	6.0	5	1
9. Operation of Mixing of Plaster and Gypsum with Ventilation	2	2	1
10. Operation of Mixing of Plaster and Gypsum with Ventilation	2	2	1

<u>Task or Work</u>	<u>Present</u>	<u>Improved</u>	<u>Change of Work Practice & Approved Respirator</u>
9. Asbestos Installation in Enclosed Spaces	10-45	10	1
10. Asbestos Block Cutting Installation			
Ventilated	5	2	1
Unventilated	25	5	1
11. Asbestos Cement Mixing			
Unventilated	100-200	25	10
Ventilated Bay	2	1	1
12. Handling Asbestos Materials (RM) on Day Work	40-100	50	10
13. Working on Ceiling at Height	10-40	10	5
14. In-Plant Exposure from grinding Nozzle 75 feet away	40-60 75-100	30	5
15. In-Plant Exposure from grinding Nozzle	50-70	20	5
16. In-Plant Exposure from grinding Nozzle	200+	100+	50
17. In-Plant Exposure from grinding Nozzle	20	10	2
18. In-Plant Exposure from grinding Nozzle	5 (Intermittent)	1	> 1