

WIN REF: ABRAMS
November 1992

From : Accident Prevention, 4-G-10
WIN : 236-2163
Date : January 5, 1976
Subject: Asbestos Questionnaire

To

Mr. Keith A. Bodden
Industrial Hygiene Administrator
R & D 401 3Y9

cc: Mr. W. H. Ziefel, Gateway 2070

Per our recent telephone conversation, enclosed find a duplicate copy of the 13 page Asbestos Information Association Questionnaire. The Asbestos Information Association has engaged environmental consultant, Roy F. Weston, to collect information and prepare a report covering the technological feasibility and economic impact of the proposed O.S.H.A. Standards.

I received this information from our Purchasing Department and plan not to complete the questionnaire and participate in the program. Please review the enclosed information, and if you have any comments, please contact me.

G. T. Brady
G. T. Brady, Manager
Accident Prevention

/ck

Attachment



03114768

IN RE: ABRAMS November 1992



ASBESTOS INFORMATION ASSOCIATION

1660 L Street, N.W. Washington, D.C. 20036 (202) 223-4885

✓
HVB-0006740

I hope you have received my letter enclosing a memorandum from Guy G. Gabrielson, Jr. which outlines the Association's plan for an industry response to the proposed revision of the OSHA asbestos standard. In my letter, I encouraged membership in the Association to those of you not presently affiliated with AIA/NA. Whether you choose to join or not, we urge all recipients to participate in this industry-wide project and ask your consideration of financial support to help defray the expenses involved.

AIA/NA has engaged the services of the highly reputable consulting firm Roy F. Weston, Inc. to gather information and prepare a report covering the technological feasibility and economic impact of the proposed OSHA standard. This proposed standard could, through the governmental law-making process, reduce the 8-hour time-weighted average exposure of 5 fibers/cc (2 fibers/cc as of July 1, 1976) to 0.5 fibers/cc.

The study that Weston will make must be based on accurate information gathered from companies representing the various asbestos-using manufacturing processes within the industry. My letter has been sent to more than two hundred companies. We believe the effort we are making will benefit your company by helping to achieve a reasonable and realistic asbestos exposure standard in the workplace. Therefore, we ask that you provide the fullest cooperation and assist in the development of information essential to the study.

Weston will contact you in the very near future to discuss the enclosed questionnaire. Depending upon the project schedule and your situation, Weston will:

- Set up an appointment for a plant site visit; or
- Record your input by telecon; or
- Provide mailing instructions for your response.

03114769

November 1992

WIN REF: ABRAMS

Page 2

To maintain complete confidentiality of all information, Weston will:

- Code the cover page of the questionnaire, detach this from the remainder of the questionnaire, and keep separate the cover page from the technical and economic information;
- Not duplicate either the cover page or the contents of the questionnaire;
- Not reveal the contents of the questionnaire to anyone outside Weston, except in the form of overall tabulations for industry segments in a form such that individual company input cannot be segregated.

At the conclusion of the rule-making process, Weston will return all data you have submitted.

A meeting, which all participating companies are urged to attend, will be held in the Mayflower Hotel, Washington, D. C., commencing at 9:00 AM February 4, 1976. At this meeting, the proposed industry response to OSHA, including medical and feasibility/economic reports and a summary report with recommendations, will be presented for approval by the attendees before the formal submission to the Department of Labor on behalf of all those companies (whether or not members of AIA/NA) who have participated. We trust that you or your representative will be present for this important meeting to endorse the presentation to OSHA. You will be sent a further reminder regarding the meeting.

Due to the February 9, 1976 deadline for comments established by OSHA, it is imperative that Weston's report be prepared at the earliest date practicable. We ask that you give urgent attention to this matter, commencing as soon as possible, to assemble the information requested in the questionnaire. To expedite the process, we ask that you duplicate the questionnaire if you have more than one plant.

Sincerely yours,



Thomas A. Dougherty
President

TAO/cdc

03114770

NWBB-0006741

IN RE: ALBRAMS November 1992

ROY F. WESTON, INC.
WESTON WAY
WEST CHESTER, PA 19380
PHONE (215) 692-3030
TELEX 83-5348



HBB-0006742

ASBESTOS INFORMATION ASSOCIATION/NORTH AMERICA

INDUSTRY QUESTIONNAIRE (1) (2)

Company Name _____
Plant Address _____
Corporate Affiliation _____
Name of Plant Contact _____ Title _____
Phone Number () _____

Note: This cover page will be detached from the remainder of the questionnaire to insure confidential handling of all information.

- (1) For assistance in completing the information in this questionnaire, please contact Mr. Jerry L. Hebb, Roy F. Weston, Inc., phone (215)692-3030.
- (2) If, for any reason, you do not choose to participate in the study by completing this questionnaire, please return it directly to Mr. Jerry L. Hebb at Roy F. Weston, Inc.

Company Code # _____

Plant Code # _____

CONFIDENTIAL

-1-

03114771

November 1992

IN THE ABRAHMS

WESTON

MMBB-0006743

I. General Product/Process Information

1. Which of the following industry segments best describes the asbestos-containing products in your operations? (Check more than one, if appropriate).

- ☐ Asbestos Cement Products (pipes, sheets, siding shingles)
☐ Asbestos Paper Products (asbestos felts, latex sheets, underlayments, electrical and commercial papers)
☐ Floor Tile
☐ Coatings (roof coatings, caulks, sealants, paints, adhesives and undercoatings)
☐ Friction Materials (automotive linings, disc components, blocks, clutch facings)
☐ Gasket, Packing, Sealing Devices
☐ Joint Cements
☐ Asbestos Reinforced Plastics
☐ Asbestos Textiles
☐ Asbestos Drilling Muds
☐ Asphaltic Paving
☐ Distribution/Resale
☐ Miscellaneous (Specify) _____

2. Which of the following categories best describes the operation at your plant? (Check more than one, if appropriate).

- a. ☐ Manufacture a product where raw asbestos is used.
What tonnage of raw asbestos do you use per year? _____
b. ☐ Process a product which already contains asbestos.

3. In reference to Question 1, for each industry segment, give the specific asbestos end product(s) (siding, pipe, etc.) manufactured, handled, or used at this location and the annual volume of each (in pounds, tons, square feet, etc.).

<u>Industry Segment</u>	<u>End Product(s)</u>	<u>Annual Volume</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

CONFIDENTIAL

-2-

Company Code # _____
Plant Code # _____

03114772

November 1992

IN RE: ABRAMS

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HBB-0006744

4. What was the aggregate sales value of asbestos containing products manufactured at this plant during the last five calendar years:

1971 \$ _____
1972 \$ _____
1973 \$ _____
1974 \$ _____
1975 \$ _____

5. What was the level of capital expenditure for plant improvement and expansion of production facilities for asbestos containing products during the last five calendar years? (Include capital expenditures for environmental control, plant improvement and expansion).

1971 \$ _____
1972 \$ _____
1973 \$ _____
1974 \$ _____
1975 \$ _____

6. What is the total plant employment at this location? _____
7. Give the approximate percentage of the employees whose asbestos exposure falls in the following categories:
- a. Continually in the work environment (operating, production, materials handling personnel) _____
 - b. Frequently in the work environment (maintenance, supervisory personnel) _____
 - c. Only occasionally (less than 5 times per week) in the work environment (management, engineers) _____
 - d. Never or very infrequently enter the work environment (secretaries, sales personnel) _____
8. What unions (locals) represent your employees, if any? _____
- a. How active have the unions been in the area of employee health and safety (demands for hazard pay, shorter work periods, etc.)?

Active Area

Extent of Activity
(V--Very, M--Moderate, N--None)

- b. What is the current pay scale range of unionized personnel? _____

CONFIDENTIAL

-3-

Company Code # _____
Plant Code # _____

03114773

IN RE: ALBRAMS November 1992

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MMBB-0006745

4. What was the aggregate sales value of asbestos containing products manufactured at this plant during the last five calendar years:

1971 \$ _____
1972 \$ _____
1973 \$ _____
1974 \$ _____
1975 \$ _____

5. What was the level of capital expenditure for plant improvement and expansion of production facilities for asbestos containing products during the last five calendar years? (Include capital expenditures for environmental control, plant improvement and expansion).

1971 \$ _____
1972 \$ _____
1973 \$ _____
1974 \$ _____
1975 \$ _____

6. What is the total plant employment at this location? _____

7. Give the approximate percentage of the employees whose asbestos exposure falls in the following categories:

- a. Continually in the work environment (operating, production, materials handling personnel) _____
b. Frequently in the work environment (maintenance, supervisory personnel) _____
c. Only occasionally (less than 5 times per week) in the work environment (management, engineers) _____
d. Never or very infrequently enter the work environment (secretaries, sales personnel) _____

8. What unions (locals) represent your employees, if any? _____

- a. How active have the unions been in the area of employee health and safety (demands for hazard pay, shorter work periods, etc.)?

Active Area

Extent of Activity
(V--Very, M--Moderate, N--None)

- b. What is the current pay scale range of unionized personnel? _____

CONFIDENTIAL

-3-

Company Code # _____
Plant Code # _____

03114774

IN THE ABRAHMS November 1992



WBB-0006746

- d. Did this equipment increase or decrease the plant/process energy requirements (electrical power, space heating, etc.)? Increase _____ Decrease _____ By how much? _____
12. What process modifications or work practice changes, if any, were instituted to reduce worker exposure to asbestos? _____

- a. Capital Cost (installed) \$ _____
b. Operating Cost (annual) \$ _____
c. What effects have these process modifications or work practice changes had on your process, product, or production rate? _____

- d. Did these process modifications or work practice changes increase or decrease the plant/process energy requirements? Increase _____ Decrease _____ By how much? _____
13. Have the control equipment or work practice changes reduced airborne asbestos levels in all of the work areas? Yes _____ No _____

List the ranges of asbestos fiber counts in the work areas involved:

Work Area	Range of Asbestos Fiber Counts	
	Before Modifications/ Changes	After Modifications/ Changes
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

14. Have the control equipment or work practice changes reduced air-time-weighted average exposure to airborne asbestos in all of the work areas? , Yes _____ No _____

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Plant Code # _____

03114775

IN RE: ABRAMS

November 1992

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Work Area	Range of TWA Asbestos Fiber Counts	
	Before Modifications/ Changes	After Modifications/ Changes

The present asbestos standard sets a maximum allowable Time-Weighted Average (TWA) exposure of 5 fibers/cc over an 8-hour period. This, by statute, will be reduced to 2 fibers/cc in July, 1976. The proposed standard would reduce this level to 0.5 fibers/cc at some time in the future. If you have already reached 0.5 fibers/cc at each step where asbestos is released into the work place, please go on to Part III; if not, please complete the following:

- 15. At each location where asbestos dust is released, do you feel you have installed the "Best Available Technology?" Yes _____ No _____
Best Available Technology (BAT) is defined as control equipment, process modifications, work practice changes, or combinations thereof, which have been demonstrated to provide the most effective control or reduction of contaminant emission.
- 16. If not, what do you consider the BAT to be, and how effective will it be in reducing airborne asbestos at each location? (Can be control equipment, work practices, process modifications, or combinations thereof).

Locations	BAT	Estimated Asbestos Fibers/cc

03114776

November 1992

IN THE AIRWAYS

WESTON

W088-0006748

17. What is the expected cost of BAT in terms of:
- Capital Cost (installed) \$ _____
 - Operating Cost (annual) \$ _____
 - Plant/Process Energy Requirements, Increase _____
Decrease _____
 - Personnel Requirements, Increase _____ Decrease _____
 - Process/Product Effects, Increase \$ _____
Decrease \$ _____
Explain _____
 - By what date could BAT be implemented? _____

18. If the Best Available Technology does not reduce worker exposure to a TWA of 0.5 fibers/cc and a ceiling of 5 fibers/cc at all points, provide your considered judgment on the possibility, cost, and timing to develop new technology to achieve this level. What approach might be used? _____
- _____
- _____
- _____
- _____

19. If the proposed 0.5 fibers/cc level is adopted, what action is foreseen at your plant? _____
- _____
- _____
- _____
- _____

III. Industrial Hygiene and Health Information

20. The existing and proposed standards require certain industrial hygiene practices where workers are exposed to airborne asbestos below the established TWA or ceiling levels. Do you (provide cost data where available):

	Yes	No	Cost/ Man-Year	Total Plant Cost/Year
a. Provide preplacement employee medical exams?	_____	_____	_____	_____
b. Provide annual employee medical exams?	_____	_____	_____	_____
c. Provide termination employee medical exams?	_____	_____	_____	_____

CONFIDENTIAL

-7-

Company Code # _____
Plant Code # _____

03114777

November 1992

IN RE: ABRAMS

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	<u>Yes</u>	<u>No</u>	<u>Cost/ Man-Year</u>	<u>Total Plant Cost/Year</u>
d. Retain medical records (20 year period)?	_____	_____	_____	_____
e. Maintain records of employee exposure to asbestos fiber (3 year period)?	_____	_____	_____	_____
f. Dispose of waste materials which may contain asbestos in sealed containers?	_____	_____	_____	_____
g. Provide caution labels for all material containing unbound asbestos?	_____	_____	_____	_____
h. Provide initial monitoring (sampling) of the work place for airborne asbestos?	_____	_____	_____	_____
i. Provide periodic monitoring (sampling) of the work place for airborne asbestos?	_____	_____	_____	_____

21. Certain provisions of the existing regulation require additional industrial hygiene practices where levels of airborne asbestos exceed TWA of ceiling standards. Where these requirements apply to your plant, do you:

	<u>Yes</u>	<u>No</u>	<u>Cost/ Man-Year</u>	<u>Total Plant Cost/Year</u>
a. Have a respirator program (for use in certain work situations or emergencies)?	_____	_____	_____	_____
b. Provide worker rotation where employee is unable to function normally while wearing a respirator?	_____	_____	_____	_____
c. Provide protective clothing (for employee exposed to asbestos greater than the ceiling level)?	_____	_____	_____	_____
d. Provide change rooms (where special clothing is required)?	_____	_____	_____	_____
e. Provide separate locker facilities (where special clothing is required)?	_____	_____	_____	_____
f. Provide laundering of special clothing?	_____	_____	_____	_____
g. Post caution signs (where levels are greater than the ceiling or TWA levels)?	_____	_____	_____	_____

CONFIDENTIAL

-8-

Company Code # _____
Plant Code # _____

03114778

IN RE: ABRAMS

November 1992

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22. Do you employ a company physician? Yes _____ No _____
If yes: Full-Time _____; Part-Time _____ Part-Time hours/
week _____
23. Do you employ an industrial hygienist? Yes _____ No _____
If yes: Full-Time _____; Part-Time _____ Part-Time hours/
week _____
24. Who performs your medical examinations (clinic, resident physician, etc.)?

25. The proposed standards expand the scope of industrial hygiene practices
into areas such as: shower requirements, regulated areas, expanded
respirator programs, and employee education programs. In general,
how do you believe your employee will react to such practices? _____

IV. Economic Impact Information

26. Considering individually the major products manufactured at this location,
has implementation of asbestos exposure control procedures and industrial
hygiene programs affected the cost of these products? Yes _____
No _____
If yes, specify:

<u>Products</u>	<u>Implementation Cost, \$/Unit of Production</u>	
	<u>Increase</u>	<u>Decrease</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

27. Have you experienced a shift or change in product sales due to the
cost impact described in Question 26? Yes _____ No _____

CONFIDENTIAL

-9-

Company Code # _____
Plant Code # _____

03114779

November 1992

IN THE AIRWAYS

WESTON

WBB-0006751

a. If yes, specify:

Products	Sales Change, \$/Year	
	Increase	Decrease

b. If sales have decreased, has the demand been satisfied by:

	Yes	No
Other Asbestos Products		
Asbestos Substitute Products		
Imported Asbestos Products		

c. Which of the above has had the greatest impact on your sales?

28. Considering individually the major products manufactured at this location, do you expect the future implementation of BAT control procedures and expanded industrial hygiene programs to affect the cost of your products?

Yes _____ No _____
If yes, specify:

Products	Implementation Cost, \$/Unit of Production	
	Increase	Decrease

CONFIDENTIAL

-10-

Company Code # _____
Plant Code # _____

03114780

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29. Would you expect to experience a shift or change in product sales due to the cost impact described in Question 28? Yes _____ No _____

a. If yes, specify:

Products	Sales Change, \$/Year	
	Increase	Decrease
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

b. If you expect a sales decrease, will the demand be satisfied by:

	Yes	No
Other Asbestos Products	_____	_____
Asbestos Substitute Products	_____	_____
Imported Asbestos Products	_____	_____

c. Which of the above would you expect to have the greatest impact on your sales? _____

30. What is the typical age of production equipment in use at your plant in your particular industrial segment?

Segment	Typical Production Equipment Age, Years			
	0 - 5	5 - 15	15 - 25	25+
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

31. In your opinion, with the implementation of BAT and the proposed OSHA standard to control worker exposure to asbestos, what portion of the existing production equipment may continue to be economically utilized? (Consider the portion of capital equipment retained as a percentage of the total production area investment).

CONFIDENTIAL

-11-

Company Code # _____
Plant Code # _____

03114781

November 1992

IN RE: ABRAMS

WESTON

Less than 10% _____
10 - 25% _____
25 - 50% _____
50 - 75% _____
Greater than 75% _____

32. Within your community, which estimate best describes the portion of the total work force employed at your plant?

Less than 10% _____
10 - 25% _____
25 - 50% _____
50 - 75% _____

V. Information Regarding Manufacturers/Fabricators of Asbestos-Containing Products

The proposed regulations apply to every place of employment where asbestos, or a product containing asbestos, is manufactured, processed, packaged, stored, applied, used, or otherwise handled. It is extremely important to our assessment to include estimates of the number of people involved as your products are ultimately used and the possible asbestos exposure levels of these individuals. Insofar as is possible, kindly provide the following information:

33. Who uses the asbestos-containing products you produce (construction industry, auto repair garage, fabricator, etc.)? _____

34. Describe how your products move from your plant through the final consumer _____

35. Estimate numbers of people and what levels of asbestos dust exposure, if any, may occur at each step (from further processing, fabrication, installation, etc.)? _____

CONFIDENTIAL

-12-

Company Code # _____
Plant Code # _____

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MWBB-0006753

IN RE: ABRAMS

November 1992

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36. Provide names of your customers and appropriate trade association so that Weston might obtain more comprehensive information in these areas

CONFIDENTIAL

-13-

Company Code # _____
Plant Code # _____

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