

**PLAINTIFF'S
EXHIBIT**

DUP-267

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Clinton, Iowa
October 19, 1972

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ASBESTOS DUST CONTROL

A review has been made of the requirements, procedures, and equipment needed to comply with the Occupational Safety and Health Act regarding exposure to asbestos dust. The law deals with the following major areas:

- (1) Permissible concentrations of asbestos fibers
- (2) Methods of compliance
- (3) Warning signs & labelling
- (4) Monitoring
- (5) Medical examinations
- (6) Record keeping

1 - Permissible concentrations of asbestos dust

The limit of occupational exposure to eight hours of asbestos dust must not exceed five fibers longer than five microns per cubic centimeter. (Concentrations above five fibers but not to exceed ten fibers are permitted up to fifteen minutes/hr.)

To determine what the asbestos dust exposure is in pipe coverer's work areas, a 9L49 work order is being processed to purchase a Bendix C115 Personnel Monitor. This sampler is recommended by Frank Fuller, ESD, and is available thru the Polymer Intermediates Dept. of the Company at a 10% price discount. Delivery is estimated at three weeks.

2 - Methods of compliance

Reducing the creation and dispersion of asbestos dust is the best method of compliance. To achieve this reduction the following items are proposed:

A - Wearing of respirators by all maintenance personnel when working with (or in the immediate area of) asbestos insulation material. To implement this proposal, six M.S.A. Dustfoe # 77 respirators and appropriate filters are on order (November 1st delivery).

B - Provide a separate room, complete with a separate exhaust system, for the fabrication of asbestos insulation (see attached sketch). This "asbestos room" would contain lockers for each pipe-cover's coveralls, a Torit down-draft work bench, and new band saw (\$ 700). The lockers would be vented to the room exhaust system as would the work bench and band saw.

Asbestos Dust Control
October 17, 1972

2 - Methods of compliance (Cont'd.)

- C - Vacuuming of all asbestos material storage areas and work shops at least once each week. In the case of asbestos work shop areas, it is further recommended that they be vacuumed at the end of each work day that asbestos material was processed (handled, fabricated, etc.)**
- D - All asbestos scraps to be sealed in a plastic bag and labelled prior to disposal.**
- E - The consuming or storing of food should not be allowed in pipe covering shop.**

3 - Warning signs and labelling

Asbestos Dust cautions signs have been ordered as per proposed Engineering Standard S4T, Figure 1. These signs are enclosed in an acrylic cover and are from the same vendor that supplies this sign for the Construction Division. A sign should be secured to the pipe covers shop until such time as the proposed "asbestos room" is completed, then the sign should be relocated to that door.

Asbestos warning signs to be posted at each plant work areas (outside of pipe coverers shop) in which asbestos work is being done.

It will be necessary to attach a label (Engr. Std. S4T, Figure 2) to all raw material or scrap bags containing asbestos products. The appropriate labels are to be printed up.

4 - Monitoring

The OSHA regulation request that there be personal and environmental monitoring at intervals no longer than six months. After receipt of the Bendix sampler a program will be started whereby each pipe-coverer will initially be sampled five times (the high and the low samples to be thrown out). The average of the remaining three samples to be compared with subsequent samples taken at six month intervals.

Form EN2731 is on order from the Engineering Department to provide the appropriate form for record keeping.

Purchasing is searching for testing labs that can make the proper analysis of the test filters. So far they have made contacts with two such testing labs and are getting cost estimates for this type of work.

5 - Medical examinations

The law requires an appropriate medical examination annually and our present plant program should suffice in this regard.

6 - Record keeping

A record must be kept on each individual and shop area to be certain that, that person or work area has not been exposed to asbestos dust beyond the permissible concentrations.

The previously mentioned form EN2731 will provide this record and must be kept on file for at least three years where it must be made available upon request to the OSHA inspector.

In addition to the programs outlined above, an informal education program should be undertaken by Maintenance Supervision to inform the pipecoverers of the procedural and equipment changes that are needed to assist in asbestos dust control. Also as these steps are undertaken to meet the immediate requirements of OSHA, a long range study is to be initiated for the purpose of finding substitute materials to replace asbestos.

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