PLAINTIFF'S EXHIBIT
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Corporate Engineering

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ASBESTOS

GUIDELINES

CONTENTS

1. General
2. Hazards
3. Acceptable Concentrations of Asbestos Dust
4. Methods of Compliance
5. Material Substitution
6. Personal Protective Equipment
7. Change Rooms
8. Laundering of Abestos Contaminated Clothing
9. Monitoring
10. Caution Signs and Labels
11. Housekeeping
12. Waste Disposal
13. Medical Examinations

Appendix A - Requirements for a Miminal Acceptable Respiratory Program
Appendix B - USPHS/NIOSH Membrane Filter Method for Evaluating Airborne Asbestos Fibers
Appendix C - Environmental Protection Agency Requirements - National Emission Standard For Asbestos
61.22(d) - Demolition and Renovation
61.22(J) - Waste Disposal

1. GENERAL

1.1 One of the standards covered in OSHA Subpart Z, "Toxic and Hazardous Substances" is 1910.1001, Asbestos. This instruction is intended to aid the industrial hygienists and/or engineers responsible for employee safety and health in complying with the specific requirements of the standard.

2. HAZARDS

2.1 The hazards of asbestos are well documented and universally recognized. Its notoriety is widespread among unions and employees. Asbestos has long been known to cause asbestosis, a disease characterized by scarring and thickening of the lung wall. Today it is also known to produce a variety of irreversible cancers including pleural mesothelioma (cancer of the lining of the chest cavity), peritoneal mesothelioma (cancer of the lining of the abdomen) as well as cancers of the lungs, stomach, colon, and rectum. The early detection and treatment of these diseases is usually not possible because the symptoms are not clinically evident until 20 years after the first exposure. Additionally, there is no known safe exposure level. In recognition of the serious health hazards associated with asbestos, the Occupational Safety and Health Administration (OSHA) has imposed strict regulations designed to protect employee's exposed in the workplace.

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(c) Controls to prevent the release of asbestos fibers such as wetting, enclosure, or ventilaion should be used when removing asbestos containing materials from shipping containers.

(d) Employees engaged in the spraying of asbestos, the removal or demolition of pipes, structures, or equipment covered or insulated with asbestos, and in the removal or demolition of asbestos insulation or covering should be provided with approved respiratory equipment and special clothing.

Note: For the aforementioned operations, the OSHA Standard requires the use of Type C supplied - air respirators continuous flow or pressure demand class.

4.2 Compliance with the standard may not be achieved through the use of administrative controls (i.e., rotating employees to shorten exposure time) or the use of respirators, except during the time required to install engineering controls and institute work practices, in situations where engineering or work practice controls are either technically not feasible or feasible to an extent insufficient to reduce fiber concentrations below acceptable limits, (i.e., spraying, demolition, or removal of asbestos insulation) and during emergencies.

5. MATERIAL SUBSTITUTION

5.1 It is Company policy to minimize and/or eliminate the use of asbestos and asbestos containing materials to the maximum extent possible via material substitution. The ideal substitute is one which has no health hazard associated with it and does the job just as well. The location of substitutes should be given priority consideration.

6. PERSONAL PROTECTIVE EQUIPMENT

6.1 Respiratory Protection - In those situations previously described where filter purifying respirators are permitted, they should be selected from those approved by NIOSH. The selection of respirators will depend on the exposure. The following types are prescribed in the standard:

Willson Safety Products
P.O. Box 626
Reading, PA 19603

American Optical Corporation
Southbridge, MA 01550

Important: Whenever respiratory protective equipment is provided, all provisions of OSHA 1910.134 Respiratory Protection must be complied with. See Attachment A Requirements for a Minimal Acceptable Respiratory Program.

6.2 Protective Clothing - The standard requires the employer to provide and require the use of special clothing for any employee exposed to airborne concentrations of asbestos fibers which exceed the prescribed ceiling level and for those employees, involved in the spraying, demolition, or removal of asbestos. The special clothing required include the following:

(a) Coveralls or similar whole body clothing. Resinimpregnated paper or similar disposable clothing may be used to avoid laundering problems associated with fabric type clothing.

(b) Head Covering - A hard hat or bump cap is adequate.

(c) Gloves - Any hard-finished impermeable glove such as the Edmont Vinyl Impregnated (Werx, Seams-Rite) or equivalent are recommended.

(d) Foot Covering - Rubber boots or disposable foot covering such as the Edmont Poly-D boots are recommended.

7. CHANGE ROOMS

7.1 The employer must provide change rooms at places of employment where employees are regularly exposed to concentrations of asbestos fibers in excess of the prescribed exposure limits. Additionally, the employer must provide two separate lockers or containers for each employee, so separated or isolated as to prevent the contamination of the employee's street clothes from his work clothes.

9.4 Employee Observation of Monitoring - The standard requires that affected employees or their representatives be given a reasonable opportunity to observe any monitoring required.

9.5 Exposure Records - All records of the work, monitoring, employees involved, results of sampling and related informations msut be kept in a plant OSHA file on this subject. These records must be maintained for at least three years and should be made available upon request to the Assistant Secretary of Labor and Occupation Safety and Health, the Director of the National Instutute for Occupational Safety and Health and to authorized repesentatives of either. Additionally, every employee and former employee shall have reasonable access to any record required to be maintained which indicates the employees' own exposure to asbestos fibers.

9.6 Employee Notification - Any employee found to be exposed to concentrations of asbestos in excess of the prescribed limits must be notified in writing within five days of the finding. The employee must also be notified of the corrective action being taken.

10. CAUTION SIGNS AND LABELS

10.1 Caution Signs - Each work area where airborne concentrations of asbestos fibers may be in excess of the prescribed exposure limit must be posted with a precautionary warning sign. The signs shall display the following legend.

ASBESTOS
DUST HAZARD
AVOID BREATHING DUST
WEAR ASSIGNED PROTECTIVE EQUIPMENT
DO NOT REMAIN IN AREA UNLESS YOUR WORK REQUIRES IT
BREATHING ASBESTOS DUST MAY BE HAZARDOUS TO YOUR HEALTH

For sign specifications see 1910.1001 (g)(1)(ii)

10.2 Caution Labels - All raw materials, mixtures, scrap, waste, debris, and other products containing asbestos or their containers must bear caution labels. Those materials containing asbestos fibers which have been modified by a bonding agent, coating, binder or other material that during any handling, storage, disposal, processing or transporation, no airborne concentrations of asbestos in excess of prescribed limit, are exempted from this requirement. The label shall state the following:

CAUTION
CONTAINS ASBESTOS
AVOID CREATING DUST
BREATHING ASBESTOS MAY CAUSE
SERIOUS BODILY HARM

For label specifications see 1910.1001(g)(2)(ii)

13.3 Specific Occupations - Employees engaged in occupations which involve the use or manipulation of asbestos bearing materials on a regular or intermittent basis (e.g., pipe-fitters, employees who dismantle facilities covered with asbestos insulation, auto mechanics who perform brake or clutch maintenance) shall be given physical examinations regardless of exposure level.

13.31 Exams for these employees are warranted since airborne concentrations may vary significantly from one day to the next and continuous monitoring to insure concentrations are always below the 0.1 fiber/cc of air trigger level for physical examination is impractical.

Important: It shall be the responsibility of the local industrial hygiene organization to designate such employees.

13.4 Types of Examinations:

(a) Preplacement examinations are to be provided within 30 days of a workers first employment in an occupation exposed to airborne concentrations of asbestos fibers.

(b) Annual examinations are to be provided to all workers exposed to airborne concentrations of asbestos fibers.

(c) Termination of employment examinations are to be provided within 30 days before or after the employees last day of employment in an occupation exposed to airborne concentrations of asbestos fibers.

Note: See your locations medical organization for specific details of the examinations required.

*13.5 Medical Records - The employer must maintain complete and accurate records of the medical examinations required. These records of the medical examinations employer for at least 30 years. Additionally, these records must be made available to the Assistant Secretary of Labor for Occupational Safety and Health, the Director of NIOSH, to authorized physicians or medical consultants of either, and upon the request of an employee or former employee, to his physician.

Refer correspondence to Dept. Chief,
Corporate Safety, Industrial Hygiene,
and Human Factors Engineering or
telephone X-3532 (CORNET 222).

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