

FORM REV 1-45



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
WILMINGTON, DELAWARE 19883

January 23, 1976

TEXTILE FIBERS DEPARTMENT

TO: J. A. SIGMAN

FROM: J. G. PLASKY *JGP*

ASBESTOS SHOP ADMINISTRATION

I have received a response from each plant as shown on the attached rack-up. In summary, six plants don't allow any eating and four allow some sort of eating.

OSHA regulations state "No employee shall be allowed to consume food or beverages in a toilet room nor in any area exposed to a toxic material." "A toxic material is defined as a material in concentration or amount which exceeds the applicable limit established by a standard such as §§ 1910. 93 and 1910. 93a or in the absence of an applicable standard, which is of such toxicity so as to constitute a recognized hazard that is causing or is likely to cause death or serious physical harm." §§ 1910. 93a sets the 1976 limit for asbestos at two fibers per cubic centimeter. This article also requires all external surfaces in any place of employment shall be maintained free of accumulation of asbestos fibers if, with their dispersion, there would be an excessive concentration. Applying the logic that if we administer the shop to meet or exceed the requirements of §§ 1910. 93a, we do not have a toxic material, then the regulation does not prevent eating in the shop. While this logic seems sound (based on a strict definition of toxic material) it is not the position we would like from an overall industrial hygiene standpoint. I recommend we do the following to achieve an objective of not eating in an insulation shop:

1. Re-emphasize item No. 7 of the asbestos dust exposure recommendation "Prohibit the practice of eating food, snacks, drinks, or placing materials such as gum or tobacco products in the mouth in work areas where asbestos containing materials are being handled or fabricated.
2. Request that those plants eating in the shop today review the need to continue vs. an improved level of hygiene.

These items can be done in a letter to the Engineering Superintendent.

In summary, I feel that we should stop eating in the insulation shops, regardless of asbestos conditions, because it is a poor industrial hygiene practice, but I cannot find any regulation or standard that is black and white to say this must happen. Thus, we must appeal to the plant via the improved hygiene justification. If you are in agreement, I will pursue with the four plants involved.

JGP/ssb

DUP 1120239

DU 055261

<u>PLANT</u>	<u>CURRENT EATING POLICY</u>	<u>POLICY CHANGES</u>	<u>STATUS OF USE OF ASBESTOS IN SHOP</u>
Old Hickory	No eating in shop	No change	Use Maranite "A" cloth and listing tape
Cape Fear	No eating in shop	No change	No asbestos
Seaford	No eating in shop	No change	✓
Chestnut Run	No eating in shop	No change	No fabrication of asbestos, however, contact with it during dismantlement
Chattanooga	No eating of lunch but eat snacks	Undecided	
Martinsville	Allow eating and snacks	Will not store or consume food in shop effective 12B74	
Kinston	Eat in shops	Undecided	Only use "A" cloth
Spruance	Allows eating of lunches & snacks	No change	
Camden	No eating in shop	No change	
Waynes	Allows eating in shop	No change	No asbestos allowed in shop (asbestos used in small room not adjacent to shop)

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