

REDACTED

PLAINTIFF'S
EXHIBIT
DUP-2535

CC: J. R. Gorcyca
S. C. Johnson
W. P. Ledet
J. E. Kennedy
J. C. Warren

May 10, 1982

TO: [REDACTED]

FROM: [REDACTED]

R. A. KELLER *RAK*
A. H. NICKOLAUS *ahn*

ASBESTOS WORK PRACTICES AND
TSCA SECTION 8(e) REPORTING

Thank you for expressing your concern about asbestos removal work practices.

Your specific concern was that more attention should be given to employees during the time that old asbestos insulation is being taken out of Ops. 2-4 and other locations because the dust poses an "immediate health risk" to whoever breathes it.

Although asbestos does pose a definite health hazard for those who are exposed to it in substantial concentrations over long periods of time, the risk seems to be small for very short single exposures at a relatively small concentration such as the one you experienced. However, all exposures should be avoided since there is a possibility that they may be cumulative. Asbestos is so commonly used throughout the country that it is likely most adults have had some exposure to it. The concentration you were exposed to may or may not have been over the OSHA 15 minute exposure limit of 10 fibres greater than 5 μ m in length per cubic centimeter (or 283,000 fibers/ft³), but we suspect that it was relatively small.

Your concern will definitely be considered as we do our annual review of the asbestos handling procedure (I/H #10). Although our procedure does conform to recommended practices for asbestos removal, some improvements may be necessary to assure that persons who are near the removal job but not involved in it are adequately protected from accidental exposure.

DU 011672

"SAFETY IS MY RESPONSIBILITY"

DUP 0821257

In regard to your memorandum concerning the reporting of the incident to the United States Environmental Protection Agency under Section 8(e) of the Toxic Substances Control Act, the Director of Du Pont's Haskell Laboratory, the Director of Du Pont's Medical Division and Du Pont's Environmental Legal Section were asked to review your memorandum.

Because the adverse effects of asbestos are already well known to the Environmental Protection Agency and the pattern and level of asbestos exposure does not constitute an emergency, they do not believe this is a reportable incident and therefore we do not plan to report it.

In reporting this to us, you have satisfied your responsibility under the law. Nevertheless, if you wish to report it directly to the Environmental Protection Agency, you may do so. If you choose to do so, Du Pont will not take any adverse action against you. This is guaranteed by law.

JMK:sgd

DU 011673

"SAFETY IS MY RESPONSIBILITY"

DUP 0821258