

FILE NAME: Caterpillar (CAT)

DATE: 1986 Nov 20

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INTEROFFICE MEMORANDUM

FAC. GENERAL OFFICES

DATE November 20, 1986

PLANT/
OFFICE

DEPT.

ATTN. U.S. Safety Managers & Physicians

PLANT OR OFFICE	DEPARTMENT	ATTENTION	
☐ DESTROY		FILE UNTIL (DATE)	

Aurora

F. M. McCuskey
M. T. Neu, M.D.

Bettendorf

R. L. Verbeke

Corinth

J. J. Winterscheidt

Dallas, OR

G. Fulton

Davenport

R. L. Buckles

R. Garcia

J. C. Donahue, M.D.

Decatur

K. A. Harm

J. H. Ringer, M.D.

East Peoria

S. Clark

R. G. Daniels, M.D.

Joliet

D. Reynolds

M. T. Neu, M.D.

Lafayette

J. Dougherty

G. Underwood, M.D.

Mapleton

R. E. Allsop

J. R. Barron, M.D.

Morton

C. Carter

N. A. Vlachos, M.D.

Mossville (B)

L. Becker

D. J. Crane, M.D.

Pontiac

D. Russell

J. B. Maticka, M.D.

Tech Center

J. C. Adams

J. B. Maticka, M.D.

York

W. Glass

M. A. Zittle, D.O.

cc: F. M. Bock - AB1410
J. C. Busche - AB4225
G. W. Grawey, M.D. - AB1410
D. S. Janetka - Mapleton
J. M. Kale - East Peoria
T. VonEinem - Aurora
L. Walsh - Mossville (B)
W. Webster - Joliet
G. E. Williams - AB1410

Subject: Asbestos Standards Update

There are two asbestos standards, one for general industry 1910.19 and one for the construction industry 1926.58. We will be covered by both standards. According to OSHA, our production use of asbestos and asbestos containing products will fall under the General Industry Standard 1910.19. Our maintenance type jobs (asbestos removal and repair) will fall under the Construction/Standard 1926.58. There are similarities between the two and also differences as you would expect. Both standards have areas that will be difficult to comply with, but the Construction Standard is by far the more difficult of the two.

The present status of these standards is that they are being challenged in the court by the AFL-CIO and by the Asbestos Information Association. Testimony is presently being heard. It is uncertain at this point whether the standard will be upheld or remanded back to OSHA for modification.

If the standard is upheld, the startup dates are as follows:

- 1926.58 - June 20, 1986 + 210 days
- 1910.19 - Various dates from October 17, 1986 to July, 1988 (for specifics see standard)

On all OSHA standards, the Washington office sends out a directive to the area offices stating how the standard is to be enforced. They also offer training courses for their inspectors. Thus far, neither activity has taken place. We will be getting a copy of this directive which will enable us to better advise you on this very difficult standard.

The Organizational Resources Council (ORC), an industry lobby group to which Caterpillar belongs, is preparing a list of questions on these standards to be presented to the Washington, D.C. OSHA office. The answers to these questions will also help clarify the standard.

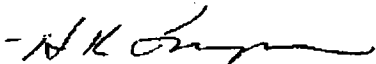
As part of our 1986 objectives, the Industrial Hygiene Division, G.O., is reviewing plant procedures for asbestos and will make their recommendations later this year.

Up to now, we have advised the plants to identify asbestos production use and take appropriate airborne samples. Most of those samples have been taken. You were recently advised that the NIOSH-approved throw away dust masks are no longer appropriate. We deferred making that change until after 3M's last challenge to this portion of the standard was denied. In the same memo we asked you to review the respirator fit testing protocol. There are three methods. The irritant smoke test looks like the most reasonable approach. The plant physicians are reviewing the medical portion of the standard.

With the uncertainties facing the asbestos standards, I recommend that we become familiar with these standards, wait for the court decision, wait for the OSHA directive, wait for industrial hygiene's review of the plant procedures before we embark on a permanent program for handling asbestos removal and repair.

I believe asbestos is a highly emotional political problem. It is not, in my opinion, a serious health problem for Caterpillar. Airborne samples taken on our production uses have been quite low. The only area that will give us problems will be tear out and removal of old asbestos insulation. Asbestos becomes a problem when made airborne. We should not get into immediate, massive removal projects. Removal should be our last choice. We should be locating our asbestos insulation, inspecting it, repairing damaged areas, and encapsulating others. It is my recommendation that we use reputable, experienced, outside contractors for jobs of this sort. In so doing, we avoid many portions of the standard and future liabilities. Please relay this information to the appropriate plant personnel (Plant Engineering, etc.) who are engaged in maintenance-type asbestos removal.

We will continue to closely monitor this situation and keep you informed. If you think, after we have all the facts, we need to have a meeting at General Offices to discuss these matters and plan compliance strategy. I would like to hear from you.



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