AT&T Bell Laboratories

PLAINTIFF'S EXHIBIT
ATT-117

subject: Removal of Asbestos

date: July 16, 1984

from: H. R. Fitch
IH 77143A
2B-104 x6937

MEMORANDUM FOR FILE

Procedure for Building Shop Personnel, Maintenance Personnel, Plant Operational Personnel, Engineers, and Contractors involved in removal of asbestos.

Attached is a copy of the operational procedures, recommended by the Industrial Hygiene and Safety Group of AT&T Bell Laboratories, to be followed when removing asbestos in the work area. These procedures supercede all previously issued memorandums or operational procedures.

Supervision is responsible for the protection of/and notifying their employees of the possible health hazard due to the exposure to asbestos fibers.

Periodically, air samples are taken from the work area and analyzed for the exposure contaminant levels. We have yet to record an exposure level anywhere near the Permissible Exposure Limits (PELs). You will be kept abreast of any changes in regard to the EPA asbestos regulations.

IH-77143A-HRF-bmc

H. R. Fitch

Att.
As stated

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Continued next page

(iii) Spraying, demolition, or removal. 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 coverings shall be provided with respiratory equipment in accordance with paragraph (d) (2) (iii) of this section and with special clothing in accordance with paragraph (d) (3) of this section.

(d) Personal protective equipment.

1. Compliance with the exposure limits prescribed by paragraph (b) of this section may not be achieved by the use of respirators or shift rotation of employees, except:

(i) During the time period necessary to install the engineering controls and to institute the work practices required by paragraph (c) of this section;

(ii) In work situations in which the methods prescribed in paragraph (c) of this section are either technically not feasible or feasible to an extent insufficient to reduce the airborne concentrations of asbestos fibers below the limits prescribed by paragraph (b) of this secton; or

(iii) In emergencies.

(iv) Where both respirators and personnel rotation are allowed by subdivisions (i), (ii), or (iii) of this subparagraph, and both are practicable, personnel rotation shall be preferred and used.

2. Where a respirator is permitted by subparagraph (1) of this paragraph, it shall be selected from among those approved by the Bureau of Mines, Department of the Interior, or the National Institute for Occupational Safety and Health, Department of Health. Education and Welfare, under the provisions of 30 CFR Part 11 (37 F.R. 6244, Mar. 25, 1972), and shall be used in accordance with subdivisions (i), (ii), (iii), and (iv) of this subparagraph.

(i) Air purifying respirators. A reusable or single use air purifying respirator, or a respirator described in subdivision (ii) or (iii) of this subparagraph, shall be used to reduce the concentrations of airborne asbestos fibers in the respirator below the exposure limits prescribed in paragraph (b) of this section, when the ceiling or the 8-hour time-weighted average airborne concentrations of asbestos fibers are reasonably expected to exceed no more than 10 times those limits.

(iv) Establishment of a respirator program.

(a) The employer shall establish a respirator program in accordance with the requirements of the American National Standards Practices for Respiratory Protection, ANSI Z88.2-1969, which is incorporated by reference herein.

(c) No employee shall be assigned to tasks requiring the use of respirators if, based upon his most recent examination, an examining physician determines that the employee will be unable to function normally wearing a respirator, or that the safety or health of the employee or other employees will be impaired by his use of a respirator. Such employee shall be rotated to another job or given the opportunity to transfer to a different position whose duties he is able to perform with the same employer, in the same geographical area and with the same seniority, status, and rate of pay he had just prior to such transfer, if such a different position is available.

3. Special clothing: The employer shall provide, and require the use of, special clothing, such as coveralls or similar whole body clothing, head coverings, gloves, and foot coverings for any employee exposed to airborne concentrations of asbestos fibers, whichexceed the ceiling level prescribed in paragraph (b) of this section.

4. Change rooms.

(i) At any fixed place of employment exposed to airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section, the

employer shall provide change rooms for employees working regularly at the place.

(ii) Clothers lockers: The employer shall provide two separate lockers or containers for each employee, so separated or isolated as to prevent contamination of the employee's street clothes from his work clothes.

(iii) Laundering: (a) Laundering of asbestos contaminated clothing shall be done so as to prevent the release of airborne asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section.

b. Any employer who gives asbestos contaminated clothing to another person for laundering shall inform such person of the requirement in (a) of this subdivision to effectively prevent the release of airborne asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section.

c. Contaminated clothing shall be transported in sealed impermeable bags, or other closed, impermeable containers.

(4) Employee observation of monitoring. Affected employees, or their representatives, shall be given a reasonable opportunity to observe any monitoring required by this paragraph and shall have access to the records thereof.

(i) Recordkeeping

1. Exposure records. Every employer shall maintain records of any personal or environmental monitoring required by this section. Records shall be maintained for a period of at least 3 years and shall be made available upon request to the Assistant Secretary of Labor for Occupational Safety and Health, the Director of the National Institute for Occupation Safety and Health, and to authorized representatives of either.

2. Employee access. Every employee and former employee shall have reasonable access to any record required to be maintained by subparagraph (1) of this paragraph, which indicates the employee's own exposure to asbestos fibers.

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comprehensive medical examination which shall include, as a minimum, a chest roentgenogram (posterior-anterior 14 x 17 inches), a history to elicit symptomatology of respiratory disease, and pulmonary function tests to include forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV 1.0).

5. Recent examinations. No medical examination is required of any employee, if adequate records show that the employee has been examined in accordance with this paragraph within the past 1-year period.

6. Medical records (i) Maintenance. Employers of employees examined pursuant to this paragraph shall cause to be maintained complete and accurate records of all such medical examinations. Records shall be retained by employers for at least 20 years.

(ii) Access. The contents of the records of the medical examinations required by this paragraph shall be made available, for inspection and copying, to the Assistant Secretary of Labor for Occupational Safety and Health, the Director of NIOSH, to authorized physicians and medical consultants of either of them, and upon the request of an employee or former employee, to his physician. Any physician who conducts a medical examination required by this paragraph, shall furnish to the employer of the examined employee all the information specifically recovered by this paragraph and any other medical information related to occupational exposure to asbestos fibers.

PROCEDURES FOR WORK

REQUIRING HANDLING OR DISRUPTION

OF ASBESTOS-CONTAINING MATERIALS

All procedures must be in compliance with OSHA and EPA regulations.

A member of management must be designated as an asbestos program manager and given responsibility for directing, managing, and implementing work practice and general control procedures.

Engineering or work practice controls must be utilized to comply with the permissible exposure limit specified by OSHA. Whenever possible, disruption of the asbestos-containing materials must be minimized.

When feasible, wet methods of handling asbestos-containing materials are recommended. In some applications, wet methods are not appropriate and use of a high efficiency particulate (HEPA) filter is preferred.

A vacuum equipped with a HEPA filter must be available and used to clear adjacent areas of asbestos-containing debris, remove any debris from work clothing and clean surrounding areas after completion of job. Caution signs should be posted on the vacuum as follows:

CAUTION
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause
Serious Bodily Harm

A routine maintenance and inspection program should be established to assure integrity of containments, for example, hung ceiling structures, throughout the complex.

Whenever possible, work involving handling or disruption of asbestos-containing material occupied areas should be scheduled out of hours.

To the extent possible reentrainment of asbestos fibers onto the return air should be minimized by

- isolating area from return air plenum
- blocking off return air vents
- Shutting down HVAC System in and around work area

A notification or permit system should be developed for entry into containments, for example, hung ceiling structures.

Representative and Routine Monitoring must be conducted to:

a. establish range of exposures during work in hung ceilings and other tasks involving handling or disruption of asbestos-containing materials

b. determine fiber concentrations in surrounding areas during hung ceiling work