

INTEROFFICE CORRESPONDENCE

PLAINTIFF'S EXHIBIT

MBL-247

March 10, 1975

J. G. Keller
Medical
Room 1425

RECEIVED

MAR 11 1975

J. G. KELLER

PERSONAL PROTECTIVE MEASURES
TO BE FOLLOWED DURING
ASBESTOS REMOVAL OPERATIONS

This will confirm our conversation of March 7 regarding the captioned. We agree that generally the guidelines as written in the attachment to your letter of January 2, 1975, copies to P. C. Ingalls, P. C. Krist, E. L. Waggoner and J. Walker are adequate for their intended use.

Our version of the guide is attached for your review. Quite obviously the material is not all inclusive nor can it be if it is to be used worldwide by Mobil Oil Corporation. Detailed instructions as to the use of a NIOSH-approved respirator etc. would need to be written in by NAD if they feel it is necessary.

Also attached for your review and comments is a copy of Procedure Guide, No. 50393-0001, which we propose to issue to the International Division.



H. H. Beams

HHB/mlp
Attachments

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Personnel Protective Measures to be Followed
During Asbestos Removal Operations

1. All asbestos containing insulation must be thoroughly wetted with water before removal.

Wetting can be accomplished by any practical means such as hose lines or water spray from self-contained apparatus.

Wet steam is another possible means of saturation of asbestos if feasible and conducted safely.

Five minutes of water application for 25 square feet of asbestos surface insulation area should suffice.

When asbestos is being removed, a suitable means of containment must be used to catch chunks of asbestos to prevent dispersion of asbestos fibers.

2. Employees involved in the removal operation must be equipped with a single-use, disposable respirator as approved by appropriate local government authority. If no single-use respirator is approved and it is necessary to use one approved for multiple use, it should be discarded after use.

Employees also must wear gloves, coveralls and shoe covers. Gloves, coveralls and shoe covers, wherever possible, should be of the single-use, disposable type.

Employees must not continue to wear this protective clothing if they leave the job site for another activity and specifically when eating.

If non-disposable protective clothing is used, the collection and laundering procedures as outlined by the Medical Director's office of Mobil Oil Corporation must be followed.

3. Asbestos-insulation waste, debris and used disposable clothing must immediately be packed in impervious bags and affixed with cautionary tags. The tag shall state:

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CAUTION

Contains Asbestos Fibers

Avoid Creating Dust

Breathing Asbestos Dust May Cause Serious Bodily Harm

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PROCEDURE GUIDE

Guide No. 50393-0001

EMPLOYEE RELATIONS

Medical Supervision of Asbestos Workers

Mobil Oil Corporation
International Division

All New York departments and subsidiaries

PURPOSE

To set forth suggested guidelines for use by subsidiaries in establishing procedures for the eventual elimination of employee exposure to asbestos and asbestos products in the working environment.

NOTE: Mobil Oil Corporation and its subsidiaries operating in the United States, its territories, and possessions are required to adopt guidelines which conform to the William-Steiger Occupational Safety and Health Act of 1970. At the time this guide was issued the only Mobil International Division affiliates affected by the U.S. Occupational Safety and Health Act were Mobil Oil Caribe, Inc., San Juan Garage, Mobil Oil Micronesia, Inc., Mobil Petroleum Company, Guam, and Mobil Technical Services, Inc., Dallas, Texas. These affiliates should be guided by Management Guide 03-1308 Medical Supervision of Asbestos Workers.

REFERENCES

- Appendix 1 "ANSI Standard Z88-2-1969 Respiratory Protection".
- Appendix 2 "ANSI Standard Z9.2-1971 Fundamentals Governing Design and Operation of Local Exhaust Systems".
- Appendix 3 Engineering Guide EGE 34-B-10-1973 Thermal Insulation - Hot Service.
- Appendix 4 Handling Procedure Guide

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GENERAL

The March 1973 issue of Mobil Engineering Guide EGE 34-E-10 1973 contains a list of approved insulating materials and specifies approved methods for installing them. No asbestos or asbestos-based materials are approved for installation or re-installation in any class of service for any purpose. The only remaining source of exposure is asbestos insulation already in place. If it is removed for any reason, it should be replaced by an approved type, and it is suggested that subsidiaries establish responsibilities and procedures aimed at protecting the health of employees who may be involved in removing such old insulation.

The guidelines set forth below are intended for use in those areas where legislation regulating exposure to asbestos and asbestos products is either lacking or establishes less stringent standards than the standards set forth herein. Wherever the competent government authority has promulgated more stringent standards, they obviously supersede the standards suggested in these guidelines.

EMPLOYER-CORPORATION
MEDICAL DIRECTOR

The employer-corporation Medical Director should:

- . Provide for preplacement, periodic and termination physical examinations for all employees subject to significant exposure to asbestos dust.
- . Determine who qualifies for periodic examinations at employer-corporation expense.
- . Retain medical records for as long as required by local regulations.

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Employer-Corporation
Industrial Hygienist

The employer-corporation Industrial Hygienist should:

- . Conduct industrial hygiene surveys of all operations where asbestos is used, and at a minimum of six months intervals determine employees' exposure to asbestos dust.
- . Report findings, with recommendations, to the Plant Manager.
- . In those cases where the affiliate has no qualified industrial hygienist on its staff, assistance should be requested through the Division or corporate Medical Director's Office with copy of request to Division Safety Office.

Local Plant
Management

The employer-corporation Local Plant Management should:

- . Provide that only appropriate local government office approved respiratory protection devices are used by employees exposed to asbestos dust.
- . Arrange for the proper inspection, cleaning, repair and storage of respirators as set up in ANSI Standard Z88.2-1969.
- . Notify asbestos workers to report for preplacement, periodic and termination physical examinations.
- . Provide and require use of washing facilities and two separate lockers for clothing.
- . Provide and require use of special protective clothing and change rooms for personnel whose exposure to asbestos is in excess of the ceiling values. See Appendix 4.
- . Inform the employer-corporation Medical Director of any contemplated change in the handling and use of asbestos.
- . Maintain for a period of three years records of personal and environmental monitoring from data developed during industrial hygiene surveys.

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- . Establish a training and promotional program on the use of personal protective equipment.

DEFINITIONS

Asbestos

Asbestos includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite.

Asbestos Fibers

Asbestos fibers are fibers longer than 5 micrometers.

Permissible Exposure

The eight-hour time-weighted average airborne concentrations of asbestos fibers to which any employee may be exposed shall not exceed two fibers, longer than 5 micrometers, per cubic centimeter of air.

No employee shall be exposed at any time to airborne concentrations of asbestos fibers in excess of ten fibers, longer than five micrometers, per cubic centimeter of air.

One way to keep the airborne concentrations below the above levels is to keep old insulation being removed or scrap insulation wet when it is being handled. See Appendix 4.

FORMS

Health Examination History
Medical Evaluation

These should be whatever forms are used by the affiliate. The English versions of the forms are numbered CO-993 and CO-109⁴ respectively.

Originating Office

Employer-Corporation Employee Relations Advisor

Number & Distribution
of Copies

Original - for employer-corporation medical file
Duplicate- for designated physician's file

Where local law requires that records of physical and laboratory findings be on file, a third copy should be

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Employer-Corporation
Designated Physician

To insure effective medical control of asbestos workers,
the designated physician should require that the candidate
for such work --

Preplacement Physical
Examination

- . be in good health,
- . have no pre-existing pulmonary disabilities
- . have a pulmonary function test to include forced
vital capacity (FVC) and forced expiratory volume
at one second (FEV_{1.0}),
- . undergo, at employer-corporation expense, a compre-
hensive physical examination including review of
candidate's past pulmonary disorders with emphasis
on previous exposure to asbestos and other dusts
known to cause pulmonary fibrosis and disability,
- . obtain chest x-ray (posterior-anterior 35x42.5 cm -
14x17"),
- . be excluded from employment as an asbestos worker if
any chest x-ray findings indicate pulmonary fibrosis
or disease.

Verification of
Candidate's Fitness

Prior to asbestos exposure, the employer-corporation
designated physician should verify that the candidate
is medically fit to work in a position where the candidate
will handle or be exposed to asbestos.

Employer-Corporation
Local Plant Management

Subsequent to placement, employer corporation local plant
management should provide for --

- . annual physical examination
- . annual pulmonary function test including FVC and

FEV_{1.0}

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. annual chest x-ray (posterior-anterior (35x42.5 cm -
14x17")),

and report any changes in x-ray findings or pulmonary
function immediately to the employer-corporation Medical
Director.

NOTE: The cost of the annual physical examination should
be borne by the employer-corporation.

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