Memorandum

PLAINTIFF'S EXHIBIT
CHV-764

San Francisco, CA
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FED-OSHA ASBESTOS STANDARDS
File 126: Compliance Guideline
Asbestos

SF&H CONTACTS:

At a recent Organizational Resources Counselors (ORC) meeting with top OSHA officials, it was announced that OSHA plans to use a new approach for applying the two new Asbestos Standards to manufacturing facilities. This new approach is a change from the approach contained in the Chevron Asbestos Compliance Guideline and consists of the following:

- The Asbestos Construction Standard (1926.58) applies to all operations involving the removal of asbestos-containing materials, including all maintenance activities.

- The Asbestos General Industry Standard (1910.1001) applies only to the manufacturing of products containing asbestos, shipbuilding and brake and clutch repair work.

The approach in the Chevron Guideline was originally developed in response to public comments by OSHA officials on the correct interpretation and scope of the two standards. However, the approach in the Guideline no longer reflects the approach OSHA plans to follow in applying the two standards.

The principal effect this new approach will have on Chevron operations is that all jobs involving the removal of asbestos insulation will now be covered by the Construction Standard regardless of the size or duration of the jobs. This will require daily monitoring under the Construction Standard for employees working in regulated areas. The only operations in Chevron which will be covered by the General Industry Standard are brake and clutch repairs. A summary of the major effects of this approach on Chevron facilities is attached.

Corporate Industrial Hygiene is currently revising the Chevron Asbestos Compliance Guideline to reflect OSHA's new approach and will distribute a revised Guideline in the next few weeks. In the interim, Chevron facilities should comply with the requirements of the OSHA Asbestos Construction Standard 1926.58 for all jobs involving the removal of asbestos insulation.

Please contact Mr. J. S. Hatfield at (415) 894-5280 if you have questions on this new approach.

S. L. DRYDEN

JSH:lar/068
Attachment
cc: Mr. R. L. Arscott w/attachment
Industrial Hygiene Staff w/attachment

OSHA ASBESTOS STANDARDS

EFFECTS OF THE NEW APPROACH ON CHEVRON FACILITIES

The major effects on Chevron of the new approach for applying the Asbestos Standards to manufacturing facilities include the following:

1. Scope: The Construction Standard now applies to all maintenance activities involving asbestos removal. The only activities covered by the General Industry Standard are clutch and brake repairs.

2. Regulated Areas: All asbestos insulation removal jobs must now meet the requirements for regulated areas in 1926.58 section (e) parts (1) through (6) and section (j) parts (1) and (2) if the exposures during these jobs exceed the PEL.

   At the ORC meeting, OSHA made it clear that these requirements for regulated areas only apply to those jobs which result in exposures above the PEL. Jobs which result in exposures above the PEL, but meet the exemption for short duration small jobs also do not have to comply with these requirements. For the purposes of compliance, a short duration small job is one which meets the criteria in both (a) and (b) below.

   (a) A maintenance or renovation job (not demolition) involving asbestos removal.

   (b) A job lasting a day or less and involving only 1-3 employees.

   During the ORC meeting, OSHA stated that if the short-duration small job exemption is claimed under the Construction Standard, Appendix G becomes mandatory and must be complied with.

3. Exposure Monitoring: Daily monitoring is required under the Construction Standard for employees working in regulated areas, except for employees using supplied air positive pressure respirators. Daily monitoring may be terminated if sufficient results are obtained to demonostrate that exposures are consistently below the action level. If no previous monitoring results are available, the jobs should be monitored daily until sufficient results are obtained. Corporate Industrial Hygiene is available to provide assistance in reviewing monitoring results and determining the need for additional monitoring. Independent contractors must perform exposure monitoring unless they have sufficient data to convince Chevron facilities that exposures are consistently below the action level for the type of job planned.