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NEILSON ASSOCIATES

CONSULTANTS - EPIDEMIOLOGY, INDUSTRIAL HYGIENE, OCCUPATIONAL MEDICINE, TOXICOLOGY

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March 21, 1978

Mr. Ivars Zvirbulis
Fred S. James & Company
841 Chestnut Street
Philadelphia, Pennsylvania 19107

RE: Certainteed Corporation
Ambler, Pennsylvania Plant

Dear Ivars:

PEL		INSURANCE/ INVESTMENT	1 YR	
JDK			3 YR	
MRF				
MJW				
GR				
RAH				
NK		APR 05 1978		
		RETAIN	5 YR	
			PERM	

Several specific comments are in order with reference to Mr. Benashski's Industrial Hygiene Report. These are as follows:

1. It was noted that both Mr. Benashski and Mr. Wilms made continual adjustments of personal sampling air pumps during the sampling period. One would wonder how they maintained calibration.
2. Several of the open-faced filter cassettes were pointed upward instead of downward. This is not good Industrial Hygiene practice.
3. Presence of asbestos fibre does not constitute a hazard to employee health unless the following criteria are met:
 - a. The fibres are airborne and in quantities greater than 2 fibres per c.c. for an 8-hour work day.
 - b. There is continued exposure.
4. Swipe samples are not indicative of potential occupational exposure. The general population is exposed to asbestos fibre, i.e., from motor vehicle brake linings, asbestos in drinking water, etc.
5. Percentage of Free SiO₂ in settled dust has no analytical significance in terms of airborne concentrations, and may well contain 85-90% or higher non-respirable fractions.

PLAINTIFF'S EXHIBIT

CT-758

CTD006783

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6. Crusher Operation - 67 minute and 55 minute (2.4 and 5.3 fibres per c.c.) samples are not representative of 8-hour Time-Weighted Averages, i.e.,
 - Travelers Report 1/3/73
 - .30 fibres per c.c. - approx. 4-1/2 hours
7. Mixing Operation - Again 13 minute and 64 minute (3.4 and 2.8 fibres per c.c.) samples used as an 8-hour TWA and is not a true representation, i.e.,
 - Aetna Report 12/8/76
 - .23 fibres per c.c. - 2 hours
 - .21 fibres per c.c. - 2 hours
8. Rework Saw - Again a breathing zone sample of 50 minutes (0.6 fibres per c.c.) does not constitute an 8-hour TWA, i.e.,
 - Travelers Report 1/3/73
 - 0.6 fibres per c.c. - approx. 3-1/2 hours
 - Aetna Report 12/8/76
 - 0.0 fibres per c.c. - 2 hours
 - 0.0 fibres per c.c. - 15 minutes
9. Lehman Short Lathe - Again 1-1/2 hours (3.9 fibres per c.c.) is not a true TWA, i.e.,
 - Travelers Report 1/3/73
 - .11 fibres per c.c. - approx. 4-1/2 hours
 - Aetna Report 12/8/76
 - 1.0 fibres per c.c. - approx. 3 hours
 - 1.9 fibres per c.c. - 15 minute peak
10. The paragraph (pg.9, para. 2) "Though all operations tested had exhaust ventilation, some of the piping had holes in it, the workers tended to lean into the exhaust air and dust did settle around areas of poorly designed exhaust systems." is contradictory, and exhaust system by its nature sucks inward and would not discharge fibre to the operator.
11. Without the tare and gross weights and the correction factor for the reference PVC filters it is difficult to check or follow the calculated values reported.

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In summary, this report cites as its basis for standard comparison, short term samples and only those samples where one might expect short term high fibre counts were taken. However a review of previous Industrial Hygiene Reports made by both the Travelers and the Aetna Insurance Companies are significantly lower in fibre per c.c. and are also of longer sampling duration.

I hope that this summarization is satisfactory. If you have any comments please advise.

Sincerely,



Arthur Neilson
Industrial Hygienist

AN/sn

CTD006785