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Richmond, Virginia

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Textile Fibers Department

SPRUANCE FIBERS PLANT
September 20, 1972

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Division Engineer's Office
Textile Fibers Division
Nemours Building
Wilmington, Delaware

ENGINEERING STANDARD - ASBESTOS DUST EXPOSURE, MEASUREMENT AND CONTROL

Reference: Letter September 15, 1972 to Committee Members

Requested comments on tentative Safety Engineering Standard S 4 T are listed below with proposal as written and comment indented.

(33) 3.4.1 "Insulation to be removed and discarded should be dampened prior to and during removal whenever possible."

- Suggest consideration for rewording with reference to "prior to" as a glazed or painted exterior surface will not absorb moisture. Agree with dampening during removal.

(34) 5.1 "Respirators and masks must be kept clean and sterilized prior to reissue".

- Suggest consideration for expanding to allow the issuance of respiratory equipment to individuals, to be kept and maintained by them as personal protective items.

(35) 6.2.2 "Millipore No. MAWP-037-AO filter, white, nongridded. 0.8 micron pore Millipore Corporation, Bedford, Mass. 01730"

- Suggest consideration be given to allow use of No. MAWG-037-AO filters (gridded) by those who may have a current, plentiful supply on hand.

(36) 6.3.2 "Clip filter holder to lapel or shirt pocket as close as possible to the person's mouth. This method of personnel sampling is preferred."

- Suggest consideration be given to changing wording from "mouth" to "breathing zone".

(37) 6.3.5 "Turn on pump and set at approximately two (2) liters per minute rate. Check rate periodically. When finished sampling, turn off pump, and record elapsed sampling time. Sampling record forms, EN-2731 (See Figure 3) are available from Stationery Stores, Eng. Dept., Wilmington, Delaware."

- Suggest consideration be given for use of an inline orifice (screwed into filter adapter) which meters air flow automatically, and removes chance of error in setting flow manually. These adapters are available from Millipore Corporation.

(38) 6.4 "Analysis. Completed samples (exposed filters) are placed in a mailing tube, sealed and sent to a qualified laboratory with two copies of the sampling record. Include an unexposed filter with the sample which has been handled in the same fashion without drawing air through it. Qualified laboratory information is available from Haskell Laboratory."

- Suggest consideration be given to clarify whether one (1) unexposed filter is required for each sample, or one (1) unexposed filter is required for each lot of exposed filters, which may be as many as six (6) or eight (8) in the same mailing tube. Also suggest each exposed sample be put in a plastic envelope before placing in the mailing tube.

(39) Typical Sampling Record Form EN-2731

- Suggest consideration be given as to definite value of recording "Weather-Temperature-Relative Humidity". Requirement of this may necessitate additional equipment, and forms, when samples are taken at several Plant sites simultaneously, where temperature and relative humidity conditions vary greatly.

J. M. Coleman
SPRUANCE FIBERS

Per: W. J. Venable

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