PLAINTIFF'S EXHIBIT
RMC-428

M E M O R A N D U M

January 4, 1973

TO: PLANT MANAGERS

FROM: E. C. Irby, M.D.

SUBJECT: Compliance with OSHA Asbestos Regulations

Within the next several weeks our Industrial Hygiene Department expects to have the capability of doing asbestos counts on air samples. This is being set up in conjunction with the Metallurgical Research Department. I am enclosing a Xerox copy of the asbestos regulations as published by OSHA in the Federal Register. As you can see, the Act was effective as of July 7, 1972, and allows for 5 fibers per cc over an eight hour time weighted average. This will become 2 fibers in 1976. No employee shall be exposed at any time to more than 10 fibers and then it goes on to specify the methods of compliance and protective equipment.

At this time, we have no asbestos counts and no serious estimates as to what the counts might be in our various asbestos using areas. Since personal sampling devices will be needed and there is a limit to the number of counts that can be performed, we feel the first order of priority should be at the work station of the carpenters in our cast houses where asbestos is machined and in the areas where asbestos cement is handled. To this end, our hygienist will be doing some studies at McCook and Liberty Mutual Insurance Company's hygienist plans some studies in Arkansas and Alabama. We also have plans to measure levels in the area where asbestos insulation either is being removed or installed as insulation for piping. If there are any other operations which might exceed the levels in the areas described above, we would very much like to hear from you and place these also at the top of our priority list. When we have sufficient measurements to be reasonably sure of our asbestos levels, we plan in conjunction with the Safety Department and Engineering Department, to help advise you concerning any measures which might be necessary to comply with the OSHA regulation. In the meantime it is hoped that the obvious portions of the Act will be complied with, such as using wet methods where possible, keeping asbestos bags closed when not in use, and disposing of them promptly when they are empty, and using all means of ventilation and exhaust which might be available.

E. C. Irby

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