



Shell Oil Company
Interoffice Memorandum

asbestos
book
PLAINTIFF'S EXHIBIT

SIH-2975

OCTOBER 19, 1988

FROM: STAFF INDUSTRIAL HYGIENIST, PRODUCTS HEALTH & SAFETY
TO: SEE ATTACHED DISTRIBUTION LIST
SUBJECT: INITIAL MONITORING REQUIRED UNDER AMENDMENT TO ASBESTOS STANDARD

On September 14, 1988, OSHA amended its Asbestos standards 1910.1001 and 1926.58 to incorporate an Excursion Limit of 1.0 fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of thirty minutes. This amendment requires initial monitoring to be completed by 12/13/88.

During a teleconference call between Head Office and several locations held on October 11, 1988, it was agreed that a mechanism should be established to facilitate the sharing of initial monitoring data between locations. A summary of the data submitted would be summarized by the end of 1988. While this data may not be readily useful to demonstrate OSHA compliance, it will aid in assessing the need for additional monitoring and study.

The purpose of this memorandum is to outline a strategy for accomplishing this initial monitoring data according to a standardized sampling protocol. All locations are requested to implement this procedure as soon as reasonably possible.

Locations who depend on asbestos contractors should request that they provide this monitoring data to Shell for review by December 10th. Additionally, where contractors are typically used for asbestos work, locations should verify Shell employees do not perform infrequent incidental tasks which would result in exposure to asbestos.

MONITORING REQUIREMENTS AND CONSIDERATIONS

OSHA Requirements

1926.58(f)(1)(iii) "Representative 30 minute short term employee exposures shall be determined on the basis of one or more samples representing 30 minute exposures associated with operations that are most likely to produce exposures above the excursion limit for employees in each work area."

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ABS-060739

LAM 031315

An equivalent provision exists for brake repair operations under 1910.1001 (d)(2). OSHA's intent is further explained on pg. 35621 of the Summary and Explanation: "Short-term monitoring is required whenever asbestos concentration will not be uniform throughout the workday and where high concentrations of asbestos reasonably may be expected to be released or created in excess of the EL."

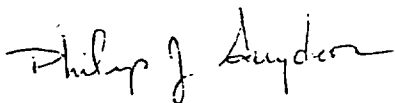
Recommended Implementation Steps and Suggested Completion Dates

1. Each location should begin now to identify those job categories on site where exposure to asbestos could foreseeably occur, e.g. brake repair, operations performing incidental maintenance, collection of bulk insulation samples, insulation removal or disturbance, etc. This list should not necessarily be limited to those jobs previously monitored.
2. By November 1st:
Document these jobs and tasks on the form provided (Attachment 1). This form represents the Initial Monitoring Study Plan. The form should be used to prioritize the sampling to be done and infer the rationale used in meeting the OSHA requirement.
3. No later than November 4th:
Submit a copy of the study plan to P. J. Snyder who will redistribute a copy of all of the locations' plans to the field by November 11th for information sharing purposes. This summary will represent Shell's initial listing of tasks of interest.
4. By December 13th:
Collect/obtain the required short term (30 min.) monitoring data for the identified tasks (where feasible and where opportunities exist) and document the results on the form provided (Attachment 2). An equivalent summary (or sampling forms) may be submitted instead of Attachment 2 if the required information is included. A minimum of one representative sample should be collected for each task identified. Note that one or more weeks will be required for sample analysis.
5. Supplement the short term monitoring conducted with TWA monitoring collected since March 14, 1988, which reveals eight-hour exposures below .06 f/cc (equivalent to the 30 minute EL). Include this information on Attachment 2 if a specific type of work can be identified as being included.
6. By December 16th:
Head Office will provide a summary of the monitoring conducted. This summary will be used to 1) identify additional monitoring needs (throughout Shell), and 2) to assess the need for periodic monitoring.

Sampling Methodology and Duration of Monitoring

1. 30 minutes should be targeted as the minimum sampling duration. Tasks will frequently be much shorter or much longer than this. For tasks of interest which require a shorter period of time, leave the pump on for the entire 30 minutes. For tasks which are longer than 30 minutes, change out the cassette at 30 minutes.
2. Flow rate of 0.5-2.5 LPM. That means a maximum flow rate of 2.5 LPM for a 30 minute excursion sample which is a maximum air volume of 75 liters. Lower flow rates and volumes should be used only in heavy dust to avoid overloading the filter. If filter darkens or loose dust is seen in cassette, a second sample with a lower flow rate/volume should be taken.
3. Sample with a 25mm MCE filter with a conductive cowl, open face, in the breathing zone. Send 10% blank filters, with a minimum of two blanks, back to the lab with each set of samples.
4. Ship filter samples in a rigid container well packed to avoid rattling around which might dislodge fibers. Do not use packing, such as expanded polystyrene, which can develop an electrostatic charge.
5. Calibrate sampling pump before and after each use with a representative filter in line.

Either Jerry Ransdell or I may be contacted regarding this.



Philip J. Snyder

PJS:bjd

cc: A. D. Ditmar
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PRODUCTS DISTRIBUTION LOCATIONSSEWAREN PLANT

D. E. Eitel

WILLBRIDGE PLANT

C. Goetze

Date Submitted: _____

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* Check appropriate column.
** Based on current data and knowledge.

ABS-060743

LAM 031319

Location Reporting: _____
Date Submitted: _____

ASBESTOS MONITORING DATA SUMMARY

For each sample collected, provide a description of the task evaluated. Include information regarding each of the six categories (Exposure Considerations) as listed on the reverse side.

	RESULT/ SAMPLING TIME
Task Description: _____ _____ _____	f/cc _____ _____
Task Description: _____ _____ _____	f/cc _____ _____
Task Description: _____ _____ _____	f/cc _____ _____
Task Description: _____ _____ _____	f/cc _____ _____
Task Description: _____ _____ _____	f/cc _____ _____
Task Description: _____ _____ _____	f/cc _____ _____
Task Description: _____ _____ _____	f/cc _____ _____
Task Description: _____ _____ _____	f/cc _____ _____