PLAINTIFF'S EXHIBIT
SH-2574

910
Chlorine Institute

SC-1003 (REV. 5-78)

Shell Chemical Company
Interoffice Memorandum

8/17/83
Lois,
I understand you are Record Copy Holder of Chlorine Institute info. Therefore this should be yours. Correct?
Christy

August 14, 1983

FROM: J. F. HALL

TO: R. R. ERICKSON - DPMC
T. R. WILLIAMS

SUBJECT: THE CHLORINE INSTITUTE, INC.
"ASBESTOS MEMBER SURVEY" (JUNE '83)

Attached is the annual "Asbestos Member Survey" (June '83) conducted by The Chlorine Institute, Inc.

J. F. Hall

J. F. Hall

JFH:gc

Attachment

cc: L. A. Wheeler
W. A. Scott

N/ADM SATELLITE
8/17/83 RR Erickson
Return Document to File
Record Copy in File
✓ Information Copy
Record copy in ~~Satellite~~ Safety South File

LAM 001797

DPMC-17490

THE CHLORINE INSTITUTE, INC. 342 MADISON AVE., NEW YORK, N.Y. 10173
212 682-4324

DATE : August 8, 1983

TO : SELECTED OFFICIAL CORRESPONDENTS

FROM : Edmund J. Laubusch

SUBJECT : ASBESTOS: MEMBER SURVEY (JUNE '83)

In late June, and in anticipation of imminent OSHA asbestos rulemaking, we surveyed the membership to assess "concern levels" associated with asbestos exposure limits more stringent than the current 2 fiber/cc (TWA) limit. Results of our survey are summarized on the attached.

Responses were received from 10 companies operating 27 diaphragm facilities (about 80%).

Respondents have no concern as to their ability to achieve a 1 fiber/cc mandate; in fact, more than half of the facilities currently achieve this level even without the use of respirators. At a 0.5 fiber/cc level, essentially all would have a "moderate" concern and about half of the facilities would have some dependency on respirators. Nearly all would have "considerable" concern should a 0.1 fiber/cc limit be mandated but most could achieve compliance even at that low level with improved engineering, work practice and administrative controls, provided respirator use also were permitted.

Our survey did not address members' concerns with possible asbestos cost increases associated with added cost burdens incurred by asbestos suppliers, or with possible inability of asbestos producers to comply with a worst-case regulatory control scenario.

Attachment

cc: Selected H & T Committee members
EPC Diaphragm Cell Subcommittee
PAS Analytical Procedures Subcommittee

LAM 001798

MEMBER SURVEY: ASBESTOS (June 1983)

Respondent Company 10 companies; 27 facilities (optional)

I NUMBER OF FACILITIES AT WHICH ASBESTOS DIAPHRAGMS ARE USED _____

II TOTAL NUMBER OF EMPLOYEES POTENTIALLY EXPOSED TO ASBESTOS 715

III WORK ACTIVITY HAVING HIGHEST EXPOSURE POTENTIAL Asbestos Weighing (eg. diaphragm depositing, asbestos weighing etc.) - (describe)

A. TYPICAL EXPOSURE FREQUENCY Range: 1-7 times/wk

B. TYPICAL EXPOSURE DURATION Range: 10-120 min. Typical: 30-60 min

C. TYPICAL EXPOSURE CONCENTRATION (fibers/cc)

	Range	Max.
TWA Basis	_____	_____
Ceiling	_____	_____

IV PRESENT OVERALL CAPABILITY OF COMPLIANCE WITH DESIGNATED LIMITS SANS DEPENDENCY ON RESPIRATORS (indicate approximate time percentage) USING PRESCRIBED OSHA MEMBRANE FILTER METHOD

	%	%	%
1 fiber TWA/5 fiber ceiling	100(16)	95(11)	
0.5 fiber TWA/5 fiber ceiling	100(8)	>98(11)	>95(22)
0.1 fiber TWA/0.5 fiber ceiling	100(1)	>75(11)	<25(13)

V PROJECTED OVERALL CAPABILITY OF COMPLIANCE WITH DESIGNATED LIMITS AND PROBABLE COMPLIANCE ROUTE(S): A = Use of Substitutes
B = Improved Engineering Controls
C = Work Practices and/or Administrative Controls
D = Use of Respirators
E = Unable to achieve practically

	%	Route(s)
1 fiber TWA/5 fiber ceiling	100(27)	B,C,D(16)
0.5 fiber TWA/5 fiber ceiling	100(27)	B,C,D(16)
0.1 fiber TWA/0.5 fiber ceiling	100(20);>95(26)	B,C,D(24)

VI COMPANY "CONCERN" LEVEL: A = None; B = Moderate; C = Considerable

1 fiber TWA/5 fiber ceiling	A(26)	B(2)	C(0)
0.5 fiber TWA/5 fiber ceiling	A(4)	B(24)	C(0)
0.1 fiber TWA/0.5 fiber ceiling	A(0)	B(4)	C(24)

VII COMMENTS (eg. re availability of substitutes, adequacy of analytical methodology etc.)

- Several opined that suitable substitutes not currently available.
- Many feel analytical method undependable below c. 0.5 fibers/cc.

Note - Number in ( ) = respondent facilities

LAM 001799

DPMC-17492