

# Interoffice Memorandum

PLAINTIFF'S  
EXHIBIT  
CEL-730

|                          |                     |                          |
|--------------------------|---------------------|--------------------------|
| TO (Name and Location)   | *As Listed          | DATE 9-3-86              |
| FROM (Name and Location) | B.C. Adams - Dallas | REFERENCE NO. BEA/030/86 |

\*B. Hanson - Clear Lake  
D. Nordeen - Pampa  
G. Organ - Bay City  
D. Walker - Newark

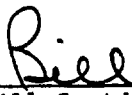
cc M.R. Stenzel - 3  
B.A. Melaas - 3  
W.A. Every - Clear Lake  
J.T. McMahon - 3  
K.L. Lombardozzi - Pampa  
A. Branecky - Edmonton  
A.B. Savage - Bay City  
J. Radomsky - Edmonton

SUBJECT: Asbestos "Competent Person"

To comply with the 1910 and 1926 Asbestos Standard each facility must provide for the training of an asbestos "Competent Person" (1926Hiii). The "Competent Person's" duties would include:

- identification of asbestos containing materials
- establishing negative pressure enclosures
- controlling entry and exit from enclosure
- supervise employee monitoring
- assure personal protection equipment is available and being used
- training of personnel
- assure engineering controls are being used

A training course meeting the requirements of the 1910 and 1926 standards has been located and reservations have been made for four persons (one from each location). If additional reservations are required, please advise me as soon as possible. The training course is scheduled for December 9-12 at the EPA Asbestos Training Center at Georgia Tech University. The cost is \$450.00 per person. Please select your facilities representative and make plans for their attendance. I will send advanced registration information when it is received from Georgia Tech. If you have any questions, please advise.

  
Bill C. Adams

DO IT RIGHT THE FIRST TIME

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OSHA ASBESTOS STANDARD

On June 20, 1986 OSHA published a revised asbestos general industry and construction standard, regulating exposure to asbestos. Both standards establish permissible exposure limits of 0.2 fibers per cubic centimeter of air as an 8 hr. time weighted average and 0.1 fiber per cubic centimeter as an action level. Employers must initiate certain compliance steps when employee exposures are above the action level. The previous OSHA PEL for asbestos was 2 fibers per cubic centimeter.

As a general rule Celanese Chemical Company is governed by the OSHA general industry standard (CFR 1910.1001); but the latest revision of the asbestos standard requires certain types of jobs to be done using requirements of the construction standard (CFR 1926.58). The construction standard applies to all demolition, construction, and repair at our facilities whether the work is performed by our employees or an outside contractor. The revised construction standard will go into effect July 21, 1986, but a 210 day grace period has been granted giving us until January 16, 1987 to be in full compliance with all sections of the revised standard. The general industry standard has an effective date of July 21 and no grace period; but several areas have delayed effective dates.

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After January 16, 1987 the new asbestos standard requires establishment of regulated work areas, additional exposure monitoring, respiratory protection, hygiene facilities, hazard communication, medical surveillance, recordkeeping requirements and protective clothing. All of which could increase cost and lower productivity.

#### Administrative Cost

- "Competent person" (formal EPA Training required)  
Duties of competent person:
  - set up enclosure
  - ensure integrity of enclosure
  - control entry and exit
  - supervise monitoring
  - ensure protective clothing is worn
  - assure proper training is accomplished
  - ensure hygiene facilities are utilized
- Regulated areas
- Industrial Hygiene personal monitoring
- Respiratory protection fit testing (semi-annually/yearly)
- Medical surveillance (annual physical after initial exposure)
- Training yearly
- Record management
  - medical record retainment
  - scheduling of specialty exams
  - training
  - monitoring
  - employee notification
  - increased medical requirements (medical questionnaire, hands-on)
  - assure monitoring requirements
  - assure engineering controls
  - assure personal protection equipment
  - assure use of hygiene facilities

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### Productivity Cost (reduction)

- Increased planning time for asbestos removal
  - identification
  - provide time for decontamination and shower
  - monitoring
- Preparation time for unit turn around
- Monitoring
- Work in respirator

### Site Cost

- Decontamination area
  - clean room
  - shower area
- Hygiene facilities
- Where feasible provide negative pressure enclosures
- Protective clothing

### Support Cost

- Asbestos identification
- Respiratory equipment and supplies
- I.H. Monitoring equipment
  - sampling collecting cost
  - sample analysis
- Laundry cost

Other concerns:   Edmonton- asbestos blankets  
                      Mexico - wide use of asbestos  
                      Clear Lake - MS Unit  
                      Bay City - Salt Unit

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REVISED CONSTRUCTION STANDARD (CFR 1926.58)

PEL 0.2 fibers per cubic centimeter based on 8 hour TWA. Action  
Action level 0.1 fibers per cubic centimeter.

Effective date July 21, 1986.

Grace period until January 16, 1987.

Requirements for Compliance:

- Provide "competent person" (trained through EPA course)
- Provide employee communication
- Establish regulated areas
- Provide negative pressure work sites (where feasible)
- Provide employee monitoring to determine exposure levels
- Provide respiratory Protection (selected based on degrees of hazard)
  - fit testing (annually/semi-annually)
- Protective clothing and laundering
- Provide decontamination area, clean room, shower area
- Employee training
- Medical Surveillance
  - hands-on
  - yearly physicals after initial exposure above action level
  - medical questionnaire
  - recordkeeping

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REVISED GENERAL INDUSTRY STANDARD (CFR 1910.1001)

PEL 0.2 fibers per cubic centimeter based on 8 hours TWA.  
Action level 0.1 fibers per cubic centimeter.

Effective date July 21, 1986.

No grace period but several exceptions to effective date.  
Exception to effective date (July 21, 1986).

- Exposure monitoring completed: by October 20, 1986.
- Establishment of regulated areas (if required based on monitoring regulation) November 17, 1986
- Respiratory Protection Requirements:  
Exposure greater than 2 fibers per cubic centimeter July 21, 1986  
Exposure less than 2 fibers per cubic centimeter Nov. 17, 1986  
Powered air purifying respirators Jan. 16, 1987
- Hygiene and Lunch Room facilities:  
Construction plans for lunch room, showers, lavatories, changing room, January 16, 1987.  
Constructed and in use, July 20, 1987.
- Employee training: October 20, 1986.
- Medical surveillance: November 17, 1986.
- Compliance program (written): July 20, 1987.
- Requirements for compliance:  
Basically the same as for construction standard but do not have to provide "competent person".

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