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PLAINTIFF'S EXHIBIT

FD-2034

Inter Office

Electrical and Electronics Division

January 22, 1980

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Subject: Procedures for Handling Material Containing Asbestos

Recently the Sandusky and Lansdale plants were inspected by OSHA as the result of employee complaints of asbestos exposure while working in the powerhouse.

During the inspection, neither location was sampled for airborne asbestos particulates but in both cases asbestos material was identified. One inspection resulted in a citation being issued with the following violations noted:

- 1) Written standard operating procedures governing the selection and use of respirators were not established (1910.134(b)(1)).
- 2) The users of respirators were not instructed and trained in the proper use of respirators and their limitations (1910.134(b)(3)).
- 3) Respirators issued for the exclusive use of one worker were not cleaned after each use and respirators used by more than one worker were not cleaned and disinfected after each use (1910.134(b)(5)).
- 4) Respirators were not stored in a convenient, clean and sanitary location (1910.134(b)(6)).
- 5) There were no regular inspections and evaluations to determine the continued effectiveness of the respirator program (1910.134(b)(9)).
- 6) Persons were assigned to tasks requiring use of respirators and it had not been determined that they were physically able to perform the work and use the equipment, and the user's medical status was not reviewed periodically (1910.134(b)(10)).

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- 7) Initial monitoring was not conducted in such a manner to determine whether every employee's exposure to airborne asbestos fibers is below the prescribed limits (1910.1001(f)(1)).
- 8) Samples were not collected from areas of a work environment which were representative of airborne concentrations of asbestos fibers which may reach the breathing zone of employees (1910.1001(f)(3)(i)).
- 9) Caution labels were not affixed to all new materials, mixtures, scrap, waste, debris, or other products containing asbestos fibers, or to their containers which during any reasonable foreseeable use, handling, storage, disposal, processing or transportation could release airborne concentrations of asbestos fibers exceeding prescribed exposure limits (1910.1001(g)(2)(i)).
- 10) Asbestos waste, scrap, debris, bags, containers, equipment and asbestos - contaminated clothing, consigned for disposal which may produce airborne levels of asbestos fibers in excess of prescribed limits were not collected and disposed of in sealed impermeable bags or other closed, impermeable containers (1910.1001(h)(2)).

Due to increasing concern regarding asbestos usage in the work place, it is imperative that we review existing practices to ensure that established procedures are being followed in accordance with OSHA regulations and corporate recommendations.

A copy of R. L. Wabeke's letter dated January 29, 1979 is attached outlining corporate staff's recommendation to substitute less hazardous, non-asbestiform materials for asbestos and its products wherever feasible. A list of suppliers of non-asbestos material has been forwarded to all plant safety engineers to assist them in identifying suitable substitutes. In conjunction with the Plant Engineering Department, all application of asbestiform material should be reviewed and every effort be made to replace it with an approved material.

It should be noted that whenever asbestiform material is removed, handled and disposed of, certain procedures must be followed as outlined in 1910.1001 of the Federal Register. The procedures include the use of respirator equipment approved to be used while working with asbestiform material. A respirator program must be established which includes medical exams, fitting, cleaning and storage of respirators as outlined in 1910.13-.

When it is necessary to remove, handle or otherwise expose employees to asbestiform material, initial air sampling must be conducted by Industrial Hygiene to establish the exposure levels. In May, 1978 all plants were requested to identify both production and non-production uses of asbestiform material and to arrange to have each area monitored by Industrial Hygiene. To date, all production uses that were identified have been reviewed by the Corporate Industrial Hygiene Department. Some non-production uses of asbestiform material have not been monitored due to the infrequency or scheduling of those particular jobs. In order to conduct the initial monitoring, it is essential to make every effort to inform Industrial Hygiene when these non-production jobs will be performed. If monitoring cannot be arranged prior to the operation, precautions must be followed as though the worst conditions exist during the operation.

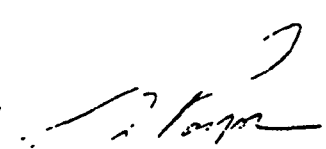
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In consideration of the increased public and employee visibility from recent plant inspections, it is requested that both production and non-production operations be resurveyed with respect to the use of asbestiform materials. A report should be forwarded to our respective offices no later than February 22, 1980 and should include the following information:

1. A listing of all asbestiform material in use within the plant identified by: a) material, b) location, c) application, and a) whether or not it has been monitored by Industrial Hygiene.
2. Provide an historical summary of the steps taken to replace the asbestiform with a substitute material.
3. Provide a separate listing of all maintenance materials, both asbestiform and non-asbestiform, used for the insulation of hot and cold surfaces.
4. Provide a copy of any plant procedure or instruction issued to employees concerning the use and/or handling of asbestiform material.



C. L. Payor



D. J. Stachelski

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Attachments

Information only

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