

SHELL OIL COMPANY

H. O. - MIM Research & Development - Marketing

TO DOSH DEPARTMENTAL REPRESENTATIVES

DATE FEBRUARY 18, 1972
FROM MANAGER, INDUSTRIAL HYGIENE,
DEPARTMENT OF OCCUPATIONAL
SAFETY AND HEALTH, HEAD OFFICE

SUBJECT HAZARDS OF ASBESTOS

01-ASBEST-TKG

On December 14, 1971, I sent you a memo regarding the adoption of an emergency standard for asbestos dust which appeared in the Federal Register of December 7, 1971. I pointed out that under the law promulgation of an emergency standard carries with it the obligation to develop a permanent standard within six months, or to drop the emergency standard altogether. On January 12, 1972, the Secretary of Labor published in the Federal Register the proposed permanent standard for exposure to asbestos dust.

The permanent standard is much more stringent than the emergency standard. While the permitted dust levels would remain the same, vacuum cleaning would be the only approved method of removal of accumulated asbestos dust. Warning signs would have to be posted at least 50 feet in each direction from the location where the hazard is present. Sign specifications are given in the proposed standard. More important, a monitoring regimen is made mandatory, as is a program of medical examinations to employees who are exposed to asbestos dust in excess of the limits specified. Both the records of monitoring and of the medical examination will be made available to the Secretary of Labor or his designee.

An Advisory Committee has been formed and is currently holding public hearings on the proposed standards. Full fledged public hearings on the standard will begin March 14th. The Department of Health, Education and Welfare published in January 1972, Criteria for a Recommended Standard for Asbestos. The proposals would reduce the allowed level to 2 fibers/cc as contrasted with the 5 fibers in the emergency level and 12 fibers/cc which was the standard heretofore. The HEW proposal would further specify a peak concentration not to exceed 10 fibers/cc. These numbers may be compared with the British level of 2 fibers/cc. While the British do have the lower number, they do not begin to enforce their law until the asbestos dust fiber count exceeds 4 fibers/cc. HEW recommends postponing the adoption of a standard based on its criteria for two years and retaining the emergency standard for that period of time.

I have spoken separately with Mr. Howard E. Ayer, Sanitary Engineer Director U.S. Public Health Service, who directed the environmental phases of PHS asbestos epidemiologic study and with Mr. John O'Neill, Chief, Division of General Industry Standards, U.S. Department of Labor. Both tell me, informally, that they would prefer to see a standard relating to atmosphere concentrations only within factory type situations, that is, in the asbestos textile or brake lining industries. For insulation workers, where the work is discontinuous or intermittent, a work practices standard would make more sense.

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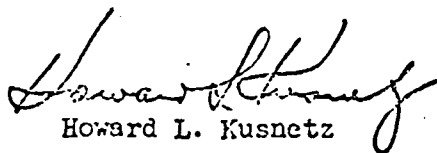
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At this time there is no way of telling what the Secretary will propose as the final standard. Should he go to the more stringent limits I am certain that there will be enough protests and requests for hearings so that the adoption of a permanent standard may be at least a year away. In any event, it is not too soon for Shell to begin to consider its position with regard to the use of asbestos in its installations. Several alternatives are evident.

We could decide upon discontinuance of use of asbestos for all new installations. This is not to imply that we would recommend immediately tearing out all asbestos insulation. Rather as insulation is replaced on routine maintenance or installed on new equipment, non-asbestiform insulation could be used in its place. Such a decision would imply the availability of equally effective material. Cost analyses would have to be made on the difference between materials and on the losses that might be incurred with the disposal of insulation that could have been reused. In any event, changing of insulation type would not preclude using the protective measures. These will have to continue in force for whatever period old asbestiform insulation were being used.

Alternatively, the company may decide to operate with work practice standards. Such standards properly planned and enforced could be sufficient to protect our employees. This would include working with wet techniques. It would certainly mean the use of respirators. In many cases, airline respirators would be necessary to assure that workers were not exposed above the legal limits. In cases where material could not be wet, special highly efficient exhaust ventilation would have to be used. (This could be in conjunction with power tools used for cutting asbestos lagging). Wetting the asbestos may lead to a serious slipping hazard. After the material has dried, there is the possibility of redispersal into the air so wet sweeping, or vacuuming would have to be installed. A work practice standard would also not eliminate the need for air-borne monitoring, rather we would be obligated to show air concentration data for legal purposes.

In conversations with other companies, it appears that both these alternatives are being used. The tendency, however, with many of the larger companies including oil companies, is to eliminate all new asbestos. In one case, at least the decision has been made to use nothing but airline respirators regardless of what the assumed concentration is. We will keep you informed as this matter develops in Washington. We should begin to consider our own policy now.


Howard L. Kusnetz

cc - Mr. R. K. MacIntyre
Mr. H. R. Kemmerer
Mr. B. W. Dunbar

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