



E. I. DU PONT DE NEMOURS & COMPANY

WILMINGTON, DELAWARE 19898

TEXTILE FIBERS DEPARTMENT

cc: J. A. S man A 00030
 N. K. Walters - Emp. Rel.
 T. W. Hannan - Legal
 J. W. Iwert - Louviers
 W. L. Pollock - Louviers
 Engineering Superintendents
 M. E. Sabla - Cape Fear
 T. J. Hampton - Spruance
 S. A. Nunnery - Camden
 E. L. Long - Kinston
 G. B. Kirkpatrick - Old Hickory
 J. O. Exley - Martinsville
 N. C. Hrnjez - Seaford
 L. B. Wilson, Jr. - Chestnut Run
 E. M. O'Donnell - Waynesboro

J. Adam

November 25, 1975

H. L. ADAM
 EMPLOYEE RELATIONS
 NEMOURS 12452

PROPOSED ASBESTOS STANDARD

We have reviewed the proposed standard and wish to make the following comments:

Comment #1 The standard must be changed or modified to allow for work places of non-fixed nature.

Discussion As now written, the monitoring requirement of three months after a measurement in excess of the limit is impractical since most of our jobs don't last nearly that long.

(2) The regulated area requirement is extremely impractical and could not be followed in the minor maintenance jobs where only one to two people are involved for 10-15 minutes to remove or replace asbestos insulation. As a matter of fact, the concept of a regulated area seems to only be applicable to shop areas or manufacturing assignments, not to maintenance type work.

The requirement for engineering controls cannot be practically pursued on small maintenance jobs and it should be so noted in the standard.

DUP 0903757

BETTER THINGS FOR BETTER LIVING ... THROUGH CHEMISTRY

SC-DP-04915

- Proposal** Write a standard relating to plant maintenance type work or let the construction standard (to be written) cover this type work.
- Comment #2** To our best knowledge, no data has been published to support the exposure limits; as a general rule arbitrary tightening standards should be challenged.
- Discussion** We in Textile Fibers do not have the data to challenge the proposed exposure levels, however, the current standard promulgated in 1972 calls for 2.0 vs. proposed 0.5 fiber/cc, however, the additional cost requires the objection be raised and satisfactorily answered. Has OSHA developed a reliable means of measuring fiber counts this low? It is our experience that measurements in this area are unreliable.
- Proposal** Leave level at 2.0 fibers/cc as now written.
- Comment #3** The wording change from dust hazard to cancer hazard is not necessary and causes loss of creditability in the standard.
- Discussion** Changes in this standard after compliance has been obtained, lessen the creditability of the standard. What has changed so dramatically from 1972 that it requires a whole new re-education program for the people with a change from warning words to scare tactics? This is inconsistent with the warnings on cigarettes.
- Proposal** Don't refer to cancer, but leave words as they are today.

The proposed standard represents a major change from the current standard and to comply will cost the Textile Fibers Department a one-time cost of \$1,000,000 and an annual cost of \$500,000. This expenditure will probably provide economical justification for major replacement of our current insulation with non-asbestos insulation.

I recommend the above comments be presented formally to OSHA as part of our Company's response.

ENGINEERING DIVISION


J. G. Plasky
Engineering Assistant

JGP/ssb

DUP 0903758