



DOW CHEMICAL U.S.A.

REV
8(E)

TEXAS DIVISION
FREEPORT, TEXAS 77541

June 30, 1983

Jim Brozzo, Midland
Jim Culp, Western
John Kiggans, OCD
John McKirdy, Louisiana

copy: L. D. Adcock
H. McNair

ASBESTOS SURVEY

Gene Gooding has asked me to pull together this data for the Chlorine Institute.

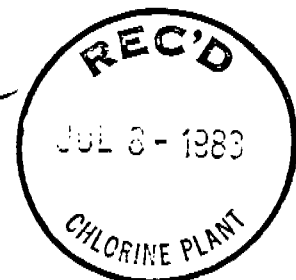
Please complete the survey and get back to me by July 13, 1983.

O. N. Hollis
Chairman, Chlor-Alkali
Issue Management Team
A-1230, 238-4759

ky

enc.

Handwritten: Sent to B.M. Lee
on 7/12/83



AN OPERATING UNIT OF THE DOW CHEMICAL COMPANY

DO 096416
CONFIDENTIAL



THE CHLORINE INSTITUTE, INC. 342 MADISON AVE., NEW YORK, N.Y. 10173

Torkleson
212 682-4324

→ *Nelson Holler*
cc Leddy
Belfit

Oel 27
Copies

DATE : June 21 , 1983
TO : SELECTED OFFICIAL CORRESPONDENTS
FROM : Edmund J. Laubusch
SUBJECT : ASBESTOS: MEMBER SURVEY

ACTION

As you are aware OSHA has plans for accelerated rulemaking on a revised workplace standard for asbestos. The agency contemplates final rulemaking this Fall. At issue, in particular, is modification of permissible exposure levels and more stringent monitoring and medical surveillance requirements. These, in turn, may impact on compliance capabilities by asbestos suppliers and users and availability of substitute products. In addition, other rulemaking initiatives by EPA under the Clean Air Act and TSCA statutes are again in progress.

Although we currently envision others (eg. the Asbestos Information Association) will take the lead in rulemaking proceedings -- particularly as they relate to risk assessments, analytical capabilities etc., some possible CI inputs might be appropriate. Towards that determination, we need to develop some baseline information.

Your cooperation in arranging for completion of the enclosed simple survey form will very much be appreciated. Your submission can be anonymous if you choose. Please return the completed survey form by July 15th.

Enclosure

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

Nelson - Could answer this survey for Don?

Gene Gooding

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MEMBER SURVEY: ASBESTOS (June 1983)

Respondent Company _____
(optional)

- I NUMBER OF FACILITIES AT WHICH ASBESTOS DIAPHRAGMS ARE USED _____
- II TOTAL NUMBER OF EMPLOYEES POTENTIALLY EXPOSED TO ASBESTOS _____
- III WORK ACTIVITY HAVING HIGHEST EXPOSURE POTENTIAL _____
(eg. diaphragm depositing, asbestos weighing etc.) (describe)
- A. TYPICAL EXPOSURE FREQUENCY _____
- B. TYPICAL EXPOSURE DURATION _____
- 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 per-
centage) USING PRESCRIBED OSHA MEMBRANE FILTER METHOD

%

1 fiber TWA/5 fiber ceiling _____

0.5 fiber TWA/5 fiber ceiling _____

0.1 fiber TWA/0.5 fiber ceiling _____

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

%

Route(s)

1 fiber TWA/5 fiber ceiling _____

0.5 fiber TWA/5 fiber ceiling _____

0.1 fiber TWA/0.5 fiber ceiling _____

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

1 fiber TWA/5 fiber ceiling _____

0.5 fiber TWA/5 fiber ceiling _____

0.1 fiber TWA/0.5 fiber ceiling _____

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

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MEMBER SURVEY: ASBESTOS (June 1983)

Respondent Company

CHLORINE
(optional)

- I NUMBER OF FACILITIES AT WHICH ASBESTOS DIAPHRAGMS ARE USED 1
- II TOTAL NUMBER OF EMPLOYEES POTENTIALLY EXPOSED TO ASBESTOS 75
- III WORK ACTIVITY HAVING HIGHEST EXPOSURE POTENTIAL DIAPHRAGM DEPOSITING
(eg. diaphragm depositing, asbestos weighing etc.) (describe)
- A. TYPICAL EXPOSURE FREQUENCY 0
- B. TYPICAL EXPOSURE DURATION 0
- C. TYPICAL EXPOSURE CONCENTRATION (fibers/cc)

	Range	Max.
TWA Basis	<u>0</u>	<u>0</u>
Ceiling	<u>0</u>	<u>0</u>

- IV PRESENT OVERALL CAPABILITY OF COMPLIANCE WITH DESIGNATED LIMITS AND
STATE DEPENDENCY ON RESPIRATORS (indicate approximate time per-
centage) USING PRESCRIBED OSHA MEMBRANE FILTER METHOD

	%	WITH DEPENDENCY ON RESPIRATORS AND ENGINEERING CONTROLS
1 fiber TWA/5 fiber ceiling	<u>100</u>	
0.5 fiber TWA/5 fiber ceiling	<u>100</u>	
0.1 fiber TWA/0.5 fiber ceiling	<u>100</u>	

- 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 Admin-
istrative Controls
D = Use of Respirators
E = Unable to achieve practically

	%	Route(s)
1 fiber TWA/5 fiber ceiling	<u>100</u>	<u>B C D</u>
0.5 fiber TWA/5 fiber ceiling	<u>100</u>	<u>B C D</u>
0.1 fiber TWA/0.5 fiber ceiling	<u>100</u>	<u>B C D</u>

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

1 fiber TWA/5 fiber ceiling	<u>C</u>
0.5 fiber TWA/5 fiber ceiling	<u>C</u>
0.1 fiber TWA/0.5 fiber ceiling	<u>C</u>

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

ADEQUACY OF ANALYTICAL - PERFORMED ACCORDING

TO NIOSH ANALYTICAL METHOD BY AN

INDEPENDENT LABORATORY