M. McCord - Hogansville

UNIROYAL



NEWS BULLETIN

TO: Factory Managers
Industrial Relations Managers
Safety Supervisors

FROM: L. F. Dieringer
Corporate Industrial Hygienist

DATE: September 30, 1976

SUBJECT: Exposure to Asbestos

Several years ago we alerted Uniroyal plants to the upcoming OSHA health standard for exposure to asbestos and recommended that each plant review their use of asbestos, particularly for pipe and equipment insulation and covering, and substitute other non-toxic materials. Since that time the permissible exposure limit (PEL) for asbestos has been reduced several times and as of July 1, 1976 was 2 fibers of asbestos per cubic centimeter of air. OSHA has under consideration a further reduction to 0.5 fibers/cc, which for all intent and purpose is zero concentration.

During an OSHA inspection this summer, one of our plants received three citations for non-compliance with the asbestos standard:

1.) 1910.1001(f)(1): 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.

2.) 1910.1001(g)(2)(i): Caution labels were not affixed to all raw materials, mixtures, scrap, waste, debris and other products containing asbestos fibers, or to their containers, so that during any reasonably forseeable use, handling, storage, disposal, processing, or transportation, no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section will be released.

3.) 1910.1001(j)(1)(2)(3) and (4): Medical examinations relative exposure to asbestos required by this paragraph were not provided at employer's cost.

In regards to the third citation, medical examinations must be provided or made available to any employee exposed to airborne concentrations of asbestos

fibers. In a recent decision the OSHA Review Commission Judges denied any employer's contention that the requirement for medical examination was only applicable when employees were exposed to concentrations that exceeded the maximum PEL set forth in 1910.1001(b).

As a result of our original warning many plants started using other non-toxic materials instead of asbestos and disposed of their supply of asbestos insulation. We recommend that each plant again review their use of such material, and if asbestos materials are found, every effort be made to substitute and dispose of the asbestos. If asbestos must be used, the asbestos standard should be reviewed to ensure that it is being adhered too and the plant is in compliance with all its requirements.

Since there is a good likelihood that pipe and equipment insulation or covering installed years ago contains asbestos, particular attention should also be paid to paragraph 1910.1001(c)(2)(iii). Besides the requirements of monitoring, labelling, medical examinations, etc., this paragraph requires that respiratory protection and special clothing be used during the removal or demolition of pipes, structures or equipment insulated or covered with asbestos.

The same requirements and precautions apply to outside contractors whose work in our plants involve installation or removal of asbestos, to prevent hazardous exposure to his as well as our employees who are in the vicinity of such work.

L. D. Lemaire

LFD/df
cc: L. J. Primeau
H. K. Norris
C. Chatterson
E. J. Sowinski
J. A. Stickles