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January 12, 1973

L. C. BENTZ
CLINTON PLANT
FILM DEPARTMENT

ASBESTOS

At the request of J. E. Gentry, I have reviewed your letter of October 19, 1972 to J. E. Howard and offer the following suggestions:

1. Permissible Concentrations of Asbestos Dust

The regulation promulgated by the U. S. Department of Labor and published in the Federal Register June 7, 1972, includes the following:

(b) Permissible exposure to airborne concentrations of asbestos fibers -

- (1) Standard effective July 7, 1972. The 8-hour time-weighted average airborne concentrations of asbestos fibers to which any employee may be exposed shall not exceed five fibers, longer than 5 micrometers, per cubic centimeter of air, as determined by the method prescribed in paragraph (e) of this section.
- (2) Standard effective July 1, 1976. The 8-hour time-weighted average airborne concentrations of asbestos fibers to which any employee may be exposed shall not exceed two fibers, longer than 5 micrometers, per cubic centimeter of air, as determined by the method prescribed in paragraph (e) of this section.
- (3) Ceiling concentration. No employee shall be exposed at any time to airborne concentrations of asbestos fibers in excess of 10 fibers, longer than 5 micrometers, per cubic centimeter of air, as determined by the method prescribed in paragraph (e) of this section.

Please note that a time limitation on a ceiling concentration has not been adopted in the regulation except insofar as any excursion above the average permissible concentration must be compensated for by a similarly lengthy excursion below the average.

January 12, 1973

2. Methods of Compliance

The wearing of respirators should never be listed first among items proposed for reducing the creation and dispersion of asbestos dust. Please note the following, copied from CFR 29 - Part 1910, Occupational Safety and Health Standards, Federal Register, p. 11319, June 7, 1972.

2. Methods of compliance. It has been pointed out by many persons, that protection against asbestos fibers is best obtained by controlling the generation of fibers first, and secondly, by controlling the dispersion of released fibers into the ambient air of the workplaces. Therefore, the standard requires feasible technological controls and appropriate work practices as the primary means of compliance. Rotation of employees as a way of meeting the TWA concentration requirement is allowed only in stated exceptional circumstances, because, as a general rule, it would be difficult to implement. Personal protective equipment, such as respirators, cannot be relied upon because, among other reasons, they may be so uncomfortable as to be burdensome, except for short periods of time. Therefore, it is expected that respirators and shift rotation will be used during the period necessary to install engineering controls and to train employees in sound work practices, but, after technological compliance has been achieved, their use must be limited to special work situations and emergencies. Where both are practicable, shift rotation is required.

5. Medical Examinations

According to the law, initial examinations of each and every employee shall be completed on or before January 31, 1973; examinations shall be done annually thereafter.

ORIGINAL SIGNED BY
JAMES E. MORGAN

JAMES F. MORGAN

JFM/aph
Enclosure

Rules & Regulations - Federal Register, Vol. 37, No. 110, Wed., June 7, 1972.