



1-2-11-81

Inter Office

Car Engineering

February 2, 1981

Mr. Paul E. Toth, Manager
Industrial Hygiene Toxicology Dept.
Employee Health Services

cc: W. E. Jackson
T. LaBo
S. M. Luke
M. J. O'Brien
D. J. Sherman, M.D.
E. B. Shultz

Subject: Industrial Hygiene Survey

Reference: 1. Your Subject Letter to Me Dated 1-19-81
2. Mr. M. J. O'Brien's 1-7-81 Letter to Me, Subject:
Industrial Hygiene Survey - Asbestos Fibers -
Arizona Proving Ground

We were pleased to receive the favorable report from the September 30-October 1, 1980 survey and to learn that no airborne asbestos was detected from the breathing zone air samples of our personnel working on brake shoe replacement and thermocouple drilling.

The survey recommendation to collect and dispose of waste containing asbestos in impermeable bags or containers, in accordance with the OSHA Asbestos Standard (29CFR 1910.1001(h)(2)) will be followed. We have obtained a copy of this regulation in order that affected personnel may study and refer to it as necessary. Since the regulation does not address the question concerning the ultimate disposition of the impermeable containers, we propose to bury them in the ground. We believe that this will not violate any provisions of the current hazardous waste regulations. If such is not the case, or if you have any other direction relative to disposition, I assume you will advise.

In response to your requirement for a plan including a timetable to implement the recommendations, please be advised that implementation is now in effect and that our future actions will be on an as required basis. I am sure that you are aware that the volume of waste containing asbestos, which is generated at Arizona Proving Ground, is extremely small.

APG will continue efforts directed at conservation of employee health and safety and compliance with OSHA standards. Our supervision have repeatedly focused on these matters by discussions in unit meetings and appropriate bulletins for employee consumption. In view of your conclusion that no apparent health hazard exists at APG, it is my belief that the Company has done a good

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Mr. Paul E. Toth

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job here. We appreciate the support received in the past from Employee Health Services as well as Safety personnel, and we look forward to the continuance of this effective relationship in the future.


H. R. Clemett, Manager
Arizona Proving Ground Dept.

EJR:sb

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