

**KARNAK CHEMICAL CORPORATION**

March 31, 1986

Mr. Cliff Patenaude, Div. Chemist
Bird, Inc.
Norwood Roofing Plant
Pleasant Street
Norwood, Mass 02062

Dear Cliff,

Pursuant to our telephone conversation, the attached is taken from Code of Federal Regulations, Chapter XVII OSHA, Parts 1900 to 1910, sent to us by OSHA.

As we stated, we can manufacture all of our fibrated cements and coatings in non-abestos form.

Very Truly Yours,

Karnak Chemical Corporation

Arthur Purdy
Ass't to the Pres.

AP:kml

cc: Ray Pike

001304

(c) Contaminated clothing shall be reported in sealed impermeable bags, or other closed, impermeable containers, and labeled in accordance with paragraph (g) of this section.

(d) *Method of measurement.* All determinations of airborne concentrations of asbestos fibers shall be made by the membrane filter method at 0.30 x (magnification) (4 millimeter objective) with phase contrast illumination.

(e) *Monitoring.*—(1) *Initial determination.* Within 6 months of the publication of this section, every employer shall place of employment asbestos fibers are released to the extent in such a way as to determine whether every employee's exposure to asbestos fibers is below the limits prescribed in paragraph (b) of this section. If the limits are exceeded, the employer shall immediately undertake a compliance program in accordance with paragraph (c) of this section.

(2) *Personal monitoring.*—(i) Samples shall be collected from within the breathing zone of the employees, on airborne filters of 0.8 micrometer or larger, mounted in an open-face or holder. Samples shall be taken at the determination of the 8-hour time-weighted average airborne concentrations and of the ceiling concentrations of asbestos fibers.

(ii) *Sampling frequency and pattern.* After the initial determinations directed by paragraph (1)(i) of this section, samples shall be of such frequency and pattern as to represent a reasonable accuracy the levels of exposure of employees. In no case shall the sampling be done at intervals shorter than 6 months for employees whose exposure to asbestos may reasonably be foreseen to exceed the limits prescribed by paragraph (b) of this section.

(3) *Environmental monitoring.* (i) Samples shall be collected from areas of work environment which are representative of the airborne concentration of asbestos fibers which may be in the breathing zone of employees. Samples shall be collected on a high efficiency filter of 0.8 micrometer or larger, mounted in an open-face filter holder. Sampling shall be taken for the

determination of the 8-hour time-weighted average airborne concentrations and of the ceiling concentrations of asbestos fibers.

(ii) *Sampling frequency and pattern.* After the initial determinations required by paragraph (1)(i) of this section, samples shall be of such frequency and pattern as to represent a reasonable accuracy the levels of exposure of the employees. In no case shall sampling be at intervals greater than 6 months for employees whose exposure to asbestos may reasonably be foreseen to exceed the exposure limits prescribed in paragraph (b) of this section.

(4) *Employee observation of monitoring.* Affected employees, or their representatives, shall be given a reasonable opportunity to observe any monitoring required by this paragraph and shall have access to the records thereof.

(5) *Caution signs and labels.*—(i) *Caution signs.*—(1) *Posting.* Caution signs shall be provided and displayed at each location where airborne concentrations of asbestos fibers may be in excess of the exposure limits prescribed in paragraph (b) of this section. Signs shall be posted at such a distance from such a location so that an employee may read the signs and take necessary protective steps before entering the area marked by the signs. Signs shall be posted at all approaches to areas containing excessive concentrations of airborne asbestos fibers.

(ii) *Sign specifications.* The warning signs required by paragraph (5)(i) of this section shall conform to the requirements of 29 CFR 1410.1410-14, verbatim in form, size, and style to this subdivision. The signs shall display the following legend in the lower panel, with letter sizes and styles of a visibility at least equal to that specified in this subdivision.

Legend	Model
Asbestos	1. Same Size, Color, or Block
Caution	2. Same Size, Color, or Block
Asbestos	3. Same Size, Color, or Block
Caution	4. Same Size, Color, or Block
Asbestos	5. Same Size, Color, or Block
Caution	6. Same Size, Color, or Block

Chapter XVII—Occupational Safety and Health Administration § 1910.1001

Legend	Model
Do Not Return to Area Unless You Were Properly Trained in Asbestos Removal Procedures	1. Same Color, or Block
Asbestos	2. Same Color, or Block
Caution	3. Same Color, or Block
Asbestos	4. Same Color, or Block
Caution	5. Same Color, or Block
Asbestos	6. Same Color, or Block

Spacing between lines shall be at least equal to the height of the upper of any letter.

(6) *Caution labels.*—(1) *Labeling.* Caution labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers, except that no label is required where asbestos fibers have been modified by a bonding agent, coating, binder, or other material so that during any reasonably foreseeable 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.

(2) *Label specifications.* The caution label required by paragraph (6)(1) of this section shall be printed in letters of sufficient size and contrast as to be readily visible and legible. The label shall state:

Caution

Contains Asbestos Fibers

Area 1 Creating Dust

Breathing Asbestos Dust May Cause Serious Lung Damage

(b) *Housekeeping.*—(1) *Cleaning.* All external surfaces in any place of employment shall be maintained free of accumulations of asbestos fibers if, with their dispersion, there would be an excessive concentration.

(2) *Waste disposal.* Asbestos waste, acid, debris, bags, containers, equipment, and asbestos-contaminated clothing, consumed for disposal, which may produce in any reasonably foreseeable use, handling, storage, processing, disposal, or transportation airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section shall be collected and disposed of in sealed impermeable bags, or other closed, impermeable containers.

(3) *Housekeeping.*—(1) *Exposure.* Breathing Asbestos Dust May Cause Serious Lung Damage

tain records of any personal or environmental monitoring required by this section. Records shall be maintained for a period of at least 20 years and shall be made available upon request to the Assistant Secretary of Labor for Occupational Safety and Health, the Director of the National Institute for Occupational Safety and Health, and to authorized representatives of either.

(2) *Access.* Employee exposure records required by this paragraph shall be provided upon request to employees, designated representatives, and the Assistant Secretary in accordance with 29 CFR 1910.20 (a)-(c) and (f)-(1).

(3) *Employee notification.* Any employee found to have been exposed at any time to airborne concentrations of asbestos fibers in excess of the limits prescribed in paragraph (b) of this section shall be notified in writing of the exposure as soon as practicable but not later than 5 days of the finding. The employee shall also be timely informed of the corrective action being taken.

(4) *Medical examinations.*—(1) *General.* The employer shall provide or make available at his cost, medical examinations relative to exposure to asbestos required by this paragraph.

(2) *Preplacement.* The employer shall provide or make available to each of his employees, within 30 calendar days following his first employment in an occupation exposed to asbestos, a comprehensive medical examination, which shall include, as a minimum, a chest roentgenogram (posterior-anterior 14 x 17 inches), a history to elicit symptomatology of respiratory disease, and pulmonary function tests to include forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV₁).

(3) *Annual examinations.* On or before January 31, 1973, and at least annually thereafter, every employer shall provide, or make available, comprehensive medical examinations to each of his employees engaged in occupations exposed to airborne concentrations of asbestos fibers. Such annual examination shall include, as a minimum, a chest roentgenogram (posterior-anterior 14 x 17 inches), a history to elicit symptomatology of respiratory disease, and pulmonary function tests to include forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV₁).

