PLAINTIFF'S
EXHIBIT
DUP-2329

E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
OLD HICKORY, TENNESSEE 37138

TEXTILE FIBERS DEPARTMENT

CC: P. T. Griffin, Athens
L. L. DeFanti, Camden
W. J. Maney, Cape Fear
H. E. Swink, Chattanooga
L. Ellison, Jr., Chestnut Run
W. D. Rhodes, Cooper River
L. E. Glass, Kinston
B. M. McCloud, Martinsville
J. C. Brown, Seaford
C. L. Abrams, Jr., Spruance
E. S. Crow, Waynesboro
H. E. Wittman-E. C. Shepherd

November 13, 1975

J. G. PLASKY
ENGINEERING ASSISTANT
ENGINEERING DIVISION
TEXTILE FIBERS DEPARTMENT
WILMINGTON

PROPOSED ASBESTOS STANDARD

(REF.: Your Memorandum October 31, 1975)

Old Hickory has the following comments after reviewing the proposed asbestos standards:

- The exposure limit of 0.5 fibers is unreasonably low. O.H. has reached the point of 97% of samples being at 2 fibers/C.C. and below whereas only 90% of our samples are at 0.5 fibers/C.C. and below.
- The proposed ceiling concentration of 5 fibers/C.C. is too low and not defined well enough.
- The requirement for protective clothing above 0.5 fibers/C.C. is also too low and essentially forces the employer to furnish daily clothing to all insulators and segregate their locker and shower facilities.
- The daily roster requirement will be almost impossible to enforce in the field regulated areas like in C.P.

Attached is a general order of magnitude estimate of the additional costs Old Hickory feels will be necessary to comply with these proposed standards.

There may be additional capital and personnel costs if other phases of the OSHA standards are similarly changed.

"DACRON" MANUFACTURING DIVISION
W. H. BURROUGHS, JR., ENGG. SUPT.

BY: G. B. Kirkpatrick
G. B. Kirkpatrick

GBK:pab



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