PLAINTIFF'S EXHIBIT
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EXX-26

MEMORANDUM

TO	SUBJECT	
Mr. J. W. Hammond	Asbestos Hazard Control Program	
F. S. Venable FSV BATON ROUGE, LA.	DATE 3/9/72	FILE NO.

The U. S. Department of Labor 's Advisory Committee on Asbestos has made recommendations to the Secretary of Labor on many phases of the proposed asbestos hazard control program. Those items included in the report of February 23, 1972, cover monitoring and records. Later reports will cover final recommendations of the Advisory Committee on the subject of asbestos standards.

At this time, we are not absolutely certain as to the scope of the Committee's final recommendations to the Secretary of Labor, nor can we be certain as to which of these specific recommendations will be adopted by the Secretary. There is good indication, however, that most of the recommendations of the Committee will be adopted without change. A minority of the Committee has objected to certain requirements concerning details of sampling and frequency of monitoring, and the requirement for protective clothing when dust concentrations exceed 10 times the limit has been termed "unnecessarily restrictive" by two members of the five man Committee. However, the Committee unanimously agreed on the recommendations for respiratory protection and two members also called for "registration", presumably a program of registering all asbestos users.

It is not yet certain as to the final values of permissable dust counts (fibers greater than 5 microns in length per cc of air). The Secretary may begin with 5 and within several years lower this to 2. There is no indication as yet as to the timing of, or effective date for, meeting the various requirements.

It would appear desirable, however for Humble to initiate a program for controlling asbestos dust exposures without delay, emphasizing compliance with certain recommendations which appear to be incontrovertable. This program should employ a stepwise approach and, depending upon the effective dates specified by USDL, work toward a complete company-wide program. Three priority classifications are suggested and are outlined below.

Priority I

1. Eliminate, or use substitutes for, all asbestos-containing materials possible. Minimize or eliminate the use of talc, asbestos insulation materials, building and construction materials (except floor tiles containing asbestos), asbestos fire blankets, etc.

2. Identify all materials purchased or used which contain more than 1 % asbestos fibers. If dust concentrations of 1000 particles/cc of air are generated then one per cent asbestos material would theoretically yield 10 fibres/cc, the upper limit for use of single use valveless filter respirators. A figure of 5% asbestos content may be more reasonable and might be adopted if subsequent dust level studies prove concentrations to be low enough to permit filter type respirators.

3. Require immediate use of approved single use or reusable filter respirators for all asbestos work pending development and acquisition of more acceptable supplied air respirators.

4. Immediately initiate cleanup operations around asbestos work. Employ wet cleanup and prompt removal of asbestos scrap to minimize attrition from traffic.

5. Rope off or restrict areas where asbestos dust is generated. Use signs stating "Keep Out" until final wording of caution signs is issued by USDL.

6. Compile a list of all asbestos exposed employees with estimates of the number of years of exposure whenever possible.

Priority II

1. Evaluate typical jobs involving the use of asbestos. Obtain representative fiber counts for such operations as rip-off, cement mixing, installation of piping insulation, hand cutting or sawing, warehouse handling of asbestos materials and asbestos cleanup operations.

2. Develop as rapidly as possible the use of advanced types of respiratory protective devices. Particularly needed is a low pressure, air supplied respirator with positive pressure in the face piece.

3. Begin vacuum clean-up procedures for removal of asbestos dust as an alternative to wet clean-up methods.

4. Set up a protective clothing program for employees exposed to dust concentrations greater than 10 times the permissable limit.

5. Obtain pulmonary function studies and chest x-rays on all "insulators" and other employees exposed to asbestos dust.

Priority III

1. Establish a regular monitoring program for all operations involving asbestos. Obtain breathing zone samples according to the schedule established by USDL. Obtain samples on all representative jobs and from representative work groups.

2. Reduce asbestos dust levels by all feasible engineering means. Provide adequate dust collection and air cleaning facilities for all shop machinery (saws etc.) working asbestos materials.

3. Obtain and post approved warning signs for asbestos areas.

4. Restrict the total number of employees working with asbestos insofar as possible.

5. Carry out preplacement examinations on all employees newly assigned to jobs involving exposure to asbestos dust. Establish periodic examination program as outlined by USDL.

You may wish to add to or shift the items listed under each priority. This may depend upon the regulations as finally adopted, or upon certain factors within the company, such as the problems peculiar to refining, pipeline or production units.

Mr. Don Hyde should be alerted to the probable influx of dust samples for evaluation. Also, some education and training in the proper procedures for dust sampling may be desirable in the case of safety personnel in remote operations where monthly monitoring is required.

We should not overlook the fact that employees must be informed of the asbestos health problem, their responsibilities for good work practices and the need for their cooperation in every operation involving asbestos dust exposure.