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ATTACHMENT B

October 30, 1972

TO: J. C. Lofland

FROM: J. C. Warner

ASBESTOS DUST

Status:

Chambers Works, Engineering Department personnel are handling and using asbestos containing materials, which through dusting could constitute a health hazard as respirable asbestos dust.

Law

On Wednesday, June 7, 1972, the Federal Register, Vol. 37, No. 110, published the national law on this matter. It appears as Title 29 - Labor, Chapter XVII - Occupational Safety and Health Administration, Department of Labor. Part 1910 - Occupational Safety and Health Standards. Standard for Exposure to Asbestos Dust.

Interpretation:

This federal regulation is interpreted as requiring employers to do certain things to show compliance. Some of those things are becoming urgent on a time basis.

1. The initial standard exposure limit of five fibers per c.c. of air became effective July 7, 1972.
2. To determine the degree of compliance, employers are required to monitor environments and individuals between June 7, 1972 and December 7, 1972.

Recommendation:

It is recommended that each Engineering division review all uses of asbestos containing materials and report each use for evaluation as a potential dust exposure hazard.

Where a potential asbestos dust exposure hazard does exist, a monitoring program must be established to determine the degree of compliance within standard exposure limits.

If any excessive exposure areas are found, a compliance program should be established immediately.

An official record keeping system should be established and made readily available to Management for reference on such occasions as a visit from OSHA Inspector.

The Technical Services Section will assist each Engineering division with potential hazard evaluation and setting up a monitoring program.

JCW:ee

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ATTACHMENT C

J. V. Flynn, Adm. Bldg.
A. L. Lynch, Medical Div.
J. C. Lofland, Adm. Bldg.

November 22, 1972

To: J. P. Patnovic, M & C Office
H. E. Kaley, M & C Office

From: J. C. Warner, Administration Building

COMPLIANCE PROGRAM FOR ASBESTOS

The following two phase program is recommended to meet OSHA requirements as outlined in J. C. Warner's letter to J. C. Lofland, dated October 30, 1972.

Phase I is an overall effort to bring all areas into compliance.

Phase II (Advanced Monitoring) is aimed at accelerating the accumulation of information required under OSHA Regulations, by December 7, 1972.

JCW:smh

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JOSEPH J. HECH

DU 056341

COMPLIANCE PROGRAM FOR ASBESTOS

Phase I

1. Evaluate Potential - Each Area and Central Crafts Group to list all uses, and sites, involving asbestos. Send lists to J. C. Warner, General Coordinator, Administration Building.
2. Quantitate Potential - J. C. Warner to identify those jobs and sites where exposure potential is felt great enough to warrant monitoring. A monitoring program to follow with J. C. Warner working with Area and Central Craft Coordinators to monitor selected jobs and sites.
3. Establish Control - J. C. Warner to work with Area and Central Crafts Coordinators to establish controls or make changes to meet limits, if necessary.

Phase II

Employees and sites involved in handling Thermal Insulation White Goods (Calcium ^{silicate}, Kaylo 20 and Unibestos) have sufficient exposure potential to warrant an immediate monitoring program.

Advanced Monitoring Program - Asbestos

General Program

1. Monitoring

Two kinds of Monitoring will be done as follows:

a. Personal Monitoring.

Samples are collected from within the breathing zone of the employee.

b. Environmental Monitoring.

Samples are collected from Areas of a work environment which are representative of the air which may reach the breathing zone of employees.

2. Permanent Sites

One permanent site, the Lagging Storage Room, should be monitored.

3. Typical Jobs

Three typical jobs should be monitored.

a. Dismantling Thermal Insulation White Goods.

b. Installing Thermal Insulation White Goods.

c. Disposal of Thermal Insulation White Goods Waste Material.

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ADVANCED MONITORING PROGRAM - ASBESTOS

DETAILED PROGRAM

1. Kinds of Monitoring

a. Personal Monitoring

Engineering foreman, supervising employe to be monitored, will visit Dr. A. L. Lynch, Medical Division, to obtain the device and to receive instructions on its operation. The device is a Bendix Micronair.

Engineering foreman will explain the device to the employe and show him how to wear it.

Engineering foreman will adjust the flow rate of Micronair as instructed by Dr. Lynch.

At completion of the sampling period, the foreman will return the Micronair Unit to Dr. Lynch for removal of exposed filter.

Dr. Lynch will have the exposed filter analysed and the cost charged to the job code furnished by the Engineering foreman.

b. Environmental Monitoring

Engineering foreman, supervising the location to be monitored, will visit Dr. A. L. Lynch, Medical Division, to obtain the device and to receive instructions on its operation. The device is a Bendix Micronair.

Engineering foreman will install the Micronair in the prescribed location and adjust the flow rate as instructed by Dr. Lynch.

At completion of the sampling period, the foreman will return the Micronair to Dr. Lynch, for removal of exposed filter.

Dr. Lynch will have the exposed filter analysed and the cost charged to the job code furnished by the Engineering foreman.

FOR INFO 10-71
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2. Permanent Sites

The Central Crafts Coordinator and J. C. Warner will select the spot inside the Lagging Storage Room where the Micronair will be placed.

The initial proposal is to pick at random one-day in each week for a period of six consecutive weeks.

Additional sampling will be influenced by the results of this series.

3. Typical Jobs

a. Dismantling Thermal Insulation White Goods.

On small jobs, less than one eight-hour day duration, personal monitoring only is recommended. Conceivably these jobs would be insulation removal to replace a gasket or renew a valve.

Here the sampling period would be for the duration of the job, and with the Micronair on the principal employe doing the job.

On large jobs, requiring all day or more for one or more employes, both personal and environmental monitoring is recommended. Conceivably these jobs would be insulation removal on a long length of piping, or on several pipes in one location, or on one or more vessels in the same location.

Here the sampling period would be for the full time the employes are on the job, and with the personal monitor on the principal employe doing the job. Another Micronair would be set up to monitor the environment in the vicinity of the job.

The initial proposal is to sample fourteen dismantling jobs in each category, large and small.

Additional sampling will be influenced by the results of this series.

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b. Installing Thermal Insulation White Goods.

On installation work, it is proposed to select at random two employees a week for seven weeks, and do personal monitoring on each for the full time on the job, preparing and installing Thermal Insulation White Goods.

Additional monitoring will be influenced by the results of this series.

c. Disposal of Thermal Insulation White Goods Waste Material.

Employees engaged in cleaning up waste material from Insulation White Goods, should be equipped with a personal monitor for the duration of their job of collecting and depositing Waste Material in airtight bags.

The initial recommendation is to sample seven waste disposal jobs.

Additional monitoring will be influenced by results of this series.

J. C. Warner
11/21/72

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