INTER-OFFICE MEMORANDUM

TO J. H. Walton
AT 1586 KB

DATE July 31, 1972
FROM A. J. Trommershausen

COPIES TO J. M. Anderson, E. J. Baldwin, J. E. Boyce, R. H. Berby, D. R. Canham, R. J. Hoffman, D. J. Schultz, J. P. Hughes, M.D.

AT 2675 OB

SUBJECT Asbestos Hazard Evaluation - Permanente

On June 14 and again on July 21 air samples were taken to assess the potential asbestos hazard during the bag dumping operation at Permanente. Bags are dumped into an unventilated hopper out in the open. They are dumped only about two or three times per month, and then for only 3-4 hours per day. A single sample was taken at the feeder in the mill building on July 21. Samples were taken in the standard manner using personal samplers, and were counted by Trapelo/West and the School of Public Health at the University of California in Berkeley.

RESULTS

Sample No.	Date Sampled	Name - Badge No.	Volume Sampled (liters)	Fibers per ml
1	6/14	R. Leon - 8394	24	2.7
2	6/14	W. A. Gonzales - 7215	40	3.1
3	6/14	R. Leon	54	2.9
4	6/14	W. A. Gonzales	30	3.3
5	7/21	Art Graves - 1267	70	2.0
6	7/21	S. Sandoval - 7975	66	1.0
7	7/21	Art Graves	52	2.0
8	7/21	S. Sandoval	52	2.0
9	7/21	General - at feeder, mill building	26	5.0

The results of these samples indicate that asbestos exposures of the men dumping the bags of asbestos are within the present eight-hour threshold limit value of 5 fibers per milliliter. Since the asbestos exposures are dependent upon many things - such as the fiber length and compactness of the asbestos, wind conditions and working procedures - it is recommended that the present respirator program and disposable clothing procedures be maintained. Although it may be debatable whether or not a caution sign must be posted, my recommendation is that such a sign be posted near the operation. Asbestos exposures should be recorded in the workmen's personnel files. Bags should be disposed of on day emptied.

Only one sample was taken at the feeder operation; however, it is fairly obvious from the amount of asbestos dust on and around the machine that this is a potentially hazardous operation. Considerable

PLAINTIFF'S EXHIBIT
KG-370

8-DD-4
F10

dust was coming out of the connection between hopper and feeder as the sampling began. Shortly after the sampling was started, a workman unplugged the system, and the dust emissions were visibly reduced. The workman who attended the feeder was properly wearing his respirator. A caution sign should be posted.

Special physical examinations for workmen exposed to asbestos need to be set up prior to January 1, 1973. I will assist you in setting up these programs.

While it appears, based on the samples taken, that the health of the workmen dumping the bags and operating the feeder is being protected adequately with respirators, the uncontrolled asbestos emissions at both operations are intolerable.

If the present system is to be maintained, a concrete slab should be constructed around the hopper into which bags are dumped. Also, a building should be erected to prevent the blowing of asbestos throughout the plant. This building should be ventilated and a dust collector added. A vacuum cleaner should be used to clean up after dumping, and for any spills.

The asbestos feeder may need to be replaced or substantially altered, to prevent plugging and uncontrolled asbestos dusting. The dusting could be controlled by a house over the feeder, but this house would need to be ventilated and the exhaust air filtered. In the interim, a vacuum cleaner should be used for cleaning up on and around the machine.

My overall impression at this time is that an engineering study should be initiated to develop alternate methods for handling asbestos, along with costs. I believe Ted Baldwin already has some plans under way in this regard, and his efforts should be encouraged and expedited.

Control measures should be designed to meet the 2 fibers per milliliter standard which will be in effect July 1, 1976. Respirators should not be used as a primary control measure. According to the present asbestos standard, local exhaust ventilation and dust collection systems shall be designed, constructed, installed and maintained in accordance with the American National Standards Fundamentals Governing the Design and Operation of Local Exhaust Systems (ANSI Z9.2-1971, available from American National Standards Institute, Inc., 1430 Broadway, New York 10018).

The cement people have expressed concern that asbestos may be "banned." While this concern is justified, I do not believe that this will happen. The Department of Labor and the National Institute for Occupational Safety and Health both realize that asbestos is a useful and necessary material, but because of the close association between asbestos exposure and lung cancer insist that the use of asbestos be very carefully controlled. It is probable, however, that the D.O.L. will after an inspection issue citations and "ban" the use of asbestos at some individual plants, until control measures are brought up to standards. A copy of the OSHA asbestos standard is attached for your reference.

gb
Attachment