



E. I. DU PONT DE NEMOURS & COMPANY
WILMINGTON, DELAWARE 19898

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J. Adam

November 25, 1975

H. L. ADAM
EMPLOYEE RELATIONS
NEMOURS 12452

PROPOSED ASBESTOS STANDARD

We have reviewed the proposed standard and wish to make the following comments:

Comment #1 The standard must be changed or modified to allow for work places of non-fixed nature.

Discussion As now written, the monitoring requirement of three months after a measurement in excess of the limit is impractical since most of our jobs don't last nearly that long.

(2) The regulated area requirement is extremely impractical and could not be followed in the minor maintenance jobs where only one to two people are involved for 10-15 minutes to remove or replace asbestos insulation. As a matter of fact, the concept of a regulated area seems to only be applicable to shop areas or manufacturing assignments, not to maintenance type work.

The requirement for engineering controls cannot be practically pursued on small maintenance jobs and it should be so noted in the standard.

DUP 0903757

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SC-DP-04915