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

TILE FIBERS DEPARTMENT

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February 7, 1977

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ASBESTOS POLICY

In June, 1974, J. A. Sigman issued the Textile Fibers Dust Exposure Guidelines (a copy is attached) and we now feel it is timely to summarize the events since the issuance of the Guidelines and state our current position.

In October, 1974, the Construction Division proposed an identification procedure which they would use to fulfill their responsibility under paragraph 5 of the Guidelines which requires asbestos free insulation to be identified. Review of their proposal and comments from the plants led us to the conclusion that it was too late to adopt one common system across the Department since most plants had already a viable system in operation.

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In January, 1976, a survey was made of the current eating policy in shops where asbestos containing materials are being handled or fabricated. It was noted that four plants allowed some form of eating and these plants were again encouraged to discontinue this practice.

In April, 1976, we responded to a notice in the Federal Register dated March 19, 1976, and changed record keeping retention from three years to twenty years.

The Guideline allows the use of asbestos containing materials under carefully controlled conditions where acceptable substitutes are not available. By definition we did not have acceptable substitutes for Marinite or A Cloth when the Guideline was issued and this office was charged with developing acceptable substitutes for these materials. Therefore, even though our goal has been not to use or work with asbestos in the future, we have had to accept these two materials. In September, 1976, you received a letter recommending the use of Marinite XL, a Johns Manville developed product, which was asbestos free. This product had been tested by the Engineering Department and several of our plants and was found to be fully acceptable as a replacement for asbestos containing Marinite. Thus, the only asbestos containing material which we do not have an acceptable substitute for is A Cloth and the attached Guidelines are changed to reflect this.

Our efforts to eliminate A Cloth have been direected at replacing it with fiberglass. Two major problems must be dealt with in this approach:

1. The attack of the common sodium silicate adhesives on the fiberglass cloth at elevated temperatures.

2. The deterioration in structural strength and increased friability of the calcium silicate insulation due to the replacement of the asbestos binding fibers with nonasbestos fibers.

The first of these two problems have been largely overcome by the use of a proprietary product originally called "Porterlag", now called "Covergard" in certain applications. This product is a fiberglass cloth with a rewettable adhesive already applied to it. The adhesive is an inorganic proprietary substance. This material has been used and is recommended for use in locations not subjected to moisture, elevated temperature, abuse or occasional removal.

In locations subject to moisture, elevated temperature, abuse or occasional removal, we consider calcium silicate with A Cloth covering acceptable at this time. In these locations, our candidate for elimination of A Cloth is an insulation system (called soft blankets) consisting of a fiberglass

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batting insulation covered with fiberglass cloth which is sewn or otherwise mechanically fastened together. Some amount of rigidity can be added by use of wire mesh or metal supports. We see this system providing better edge seals and H factors (for equivalent thickness) and physical abuse resistance while satisfactorily overcoming the two problems listed above. Initial cost is too variable to make a general statement that one is better than the other, however, it can be said the cost is so close that it probably does not influence the decision.

Many of our plants are testing this system actively now and a firm recommendation on this final elimination of asbestos is at least a year away.

The deterioration of the calcium silicate insulation, mainly due to the replacement of the asbestos binding fibers, is extremely variable by manufacture and in some cases by production unit within one company that our recommendation is to use Johns Manville Thermo 12 or a brand which you know is equally reliable.

The last item is the proposed OSHA standard which you have reviewed and commented on. Our comments have been integrated into a Company statement which was entered into the record. We expect this standard to be publicized sometime in 1977 and have recommended no action be taken until that time. When this standard is publicized, we will conduct a meeting to develop guideline changes and to insure uniform compliance.

In summary, our guidelines are viable with the understanding that the only asbestos containing material which we do not have an acceptable substitute for is A Cloth. This use is restricted to new installations or fabrications where moisture, elevated temperature, abuse or occasional removal are encountered.

ENGINEERING DIVISION

J. G. Plasky

J. G. Plasky
Engineering Assistant

JGP/ssb
Att.

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[illegible] ASBESTOS DUST [illegible]

It is the policy of the Textile Fibers Department to comply with OSHA regulations, Section 1910.93a, and, where good industrial hygiene practice and/or personnel relations indicate, to go beyond legal requirements. The following recommendations are for your guidance in implementing an asbestos dust control program:

1. To minimize personnel exposure, the use of all asbestos materials in new installations and fabrications shall be discontinued where acceptable substitutes are available. Where acceptable substitutes are not available, asbestos containing materials will be used under carefully controlled conditions.

2. All asbestos containing insulation shall be removed from inventory except for those few items where acceptable substitutes have not been developed (i.e., "A" cloth, tape, etc.).

3. Discard all damaged (requiring repair) asbestos containing insulation when it is removed and replace it with asbestos free (AF) insulation. This does not include "A" cloth and so called "suitcase" or "removable" insulation which has a durable cover to minimize handling damage nor does it include marinite.

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4. Insulation materials to be discarded are to be handled in accordance with regulations to minimize dusting by sealing in dust-proof containers (i.e., polyethylene bags or equivalent) and disposed of by acceptable landfill procedures. Removed pipe, duct, and equipment insulated with asbestos materials shall be identified prior to disposal through Salvage sale to scrap dealers.

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5. All asbestos free insulation shall be identified by appropriate marking (color code, tape, printing, etc.) in keeping with existing plant safety and housekeeping standards. Construction will identify asbestos free insulation in a manner acceptable to plant management.

6. When asbestos containing materials are fabricated ("A" Cloth, etc.), approved exhaust systems, downdraft work tables, or tools are to be used:

   a) Permanent installations in the shop areas

   b) Portable units in the field

7. Prohibit the practice of eating food, snacks, drinks, or placing materials such as gum or tobacco products in the mouth in work areas where asbestos containing materials are handled or fabricated.

8. When working in areas where applicable limits of asbestos fibers are exceeded, all outer clothing worn on the job that day shall be furnished and either disposed of or laundered by the Company. In the interest of good industrial hygiene and personnel relations, exposed clothing cannot be worn off the plant nor shall it come into contact with the person's street clothes.

9. When the applicable exposure limits to asbestos fibers are exceeded, appropriate respirators shall be worn.

10. Capability for sampling and measuring fiber and dust counts should be developed at each site. Personnel should be appropriately trained and certified, Standard Methods should be rigidly followed, and inter-laboratory checks should be periodically performed to assure accuracy and consistency.

11. Annual X-Ray and pulmonary function tests should be performed on all personnel regularly exposed to asbestos dust as a consequence of their normal assignment.

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