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MANAGER'S OFFICE
HOGANSVILLE

COMPANY PRIVATE

OSHA Status Review

15 November ~~1973~~ 1972

Winnsboro, South Carolina

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COMPANY PRIVATE

SUBJECT: OSHA Status Review
Asbeston - 15 November 1972
Winnsboro, South Carolina

BACKGROUND

On December 7, 1971 the Department of Labor by means of the Occupational Safety and Health Act, (OSHA), issued an Emergency Standard for Exposure to Asbestos Dust. The issuance of this interim regulation, coupled with the attendant publicity from various news media, presented a serious set of circumstances for the entire asbestos textile industry. Compliance with the OSHA Regulations was felt by many to be virtually impossible, and where possible, too costly so as to preclude continued operations.

On 14 March 1972, the Department of Labor opened a series of public hearings in Washington, D. C. in order to review the proposed exposure standard. Testimony regarding the total impact and feasibility of implementation was taken from representatives of the asbestos industry, labor unions, trade associations, and medical authorities.

As a result of these hearings, the Permanent Standard for Exposure to Asbestos Dust was promulgated on 7 June 1972. In essence, the new Permanent Standard changed the method for dust particle determination and stipulated that no employee should be exposed to an environment in which the airborne asbestos dust concentrations would exceed an eight hour time weighted average (TWA), of 5 fibers, longer than 5 microns, per cubic centimeter of air. Further, no employee was to be exposed at any time to concentrations in excess of 10 fibers, longer than 5 microns per cubic centimeter. Where such concentrations did exist, the level was to be reduced to the 5 fiber limit by employing certain prescribed engineering controls.

Until the 5 fiber limit was reached, additional precautions were to be used, such as, the use of face masks, protective clothing, change rooms, warning signs, etc.

The Permanent Standard further reduced the 5 fiber threshold limit value (TLV) to 2 fibers per cc. beginning on 7 July 1976.

OSHA STATUS REVIEW

I. Compliance Program

On 15 November 1972, the Asbeston Plant's OSHA Compliance Program was reviewed by Mr. R. C. Hunt. Particular emphasis was placed on the OSHA projects which had already been completed, as well as those projects which were still pending along with an estimate of their cost and completion date.

II. Self ~~Improvement~~ Inspection Program

Mr. Hunt also reviewed the establishment of a Self ~~Improvement~~ Inspection Program whereby existing violations of the OSHA regulations would be detected and corrected by plant personnel. Bi-monthly inspections are being made of each department, and the inspection teams are concentrating on such items as improved fire protection, housekeeping, installation of machinery safety devices, etc.

III. OSHA Regulations

See report dated 11/15/72.

IV. Present Level of Compliance

Hogansville has implemented many of the requirements of the Permanent Standard, including a viable dust level sampling program, the use of protective clothing, a labeling program, and the implementation of steps designed to reduce the existing dust count level (TLV).

V. Asbestos Dust Control

Mr. B. D. Bittinger presented a detailed analysis of our present dust count levels, based on approximately 100 fiber count readings taken during the month of September 1972. Plotted by departmental area, 39% of the readings taken were over the five fiber TLV, but only 11% exceeded the ceiling limit of 10 fibers.

From the data generated, Mr. Bittinger proposed an engineering program consisting of two phases and spanning a period of four years. Phase I, with a 95% confidence level, would cover a 2-1/2 year period, (beginning in 1973), and would serve to insure compliance with OSHA's present 5 fiber per cc. TLV. Phase II, with a confidence level of 75%, is designed to meet OSHA's target of 2 fibers per cc. by the end of 1976.

Cost of the package:

Phase I -	$ 73,000.00 (15 Recommended Steps)
Phase II -	201,000.00
OSHA Safety Devices:	36,000.00
	$310,000.00

(See B. D. Bittinger's report of 11/14/72 for details.)

VI. Alternatives for Compliance

The technical competence and equipment is available which would meet the present OSHA regulations. One such alternative was suggested by Mr. Hunt which would require the purchase of new equipment for opening, blending, carding, and spinning. Estimated cost - $1,000,000.00 (The Hergerth Program).

VII. Action Plan

1. Under Phase I of Mr. Bittinger's report, we will complete items 1 and 2. (See page 3.) Items 3 and 4 will require additional study.

   Responsibility - B. D. Bittinger
   Target Date for Completion - 3 January 1973

2. Research sources for outside purchase of yarns and fabrics.

   Responsibility - E. A. Morris
   Target Date for Completion - 3 January 1973

3. R. C. Hunt and B. D. Bittinger will visit Hergerth in West Germany and observe spinning operations in Italy.

   Timing - Early December 1972

4. Determine OSHA Cost Requirements assuming implementation from twisting operation through weaving and finishing.

   Responsibility - W. D. Bittinger
   Target Date for Completion - 8 December 1972

5. Evaluate commission treating of yarns and fabrics on the basis of availability and profit potential.

   Responsibility - E. A. Morris
   Target Date for Completion - 20 December 1972

6. Divestment Study - Completed

7. Pricing Study: Determine pricing limits for asbestos yarns and fabrics.

   Responsibility - E. A. Morris
   Target Date for Completion - 3 January 1973

8. Planning Review - Week of 5 February 1973. (Date to be announced by CHS.)

SUMMARY

Curiously, and in spite of the new OSHA regulations and adverse publicity, the asbestos textile industry has enjoyed a very active 1972. Measured in terms of actual pounds shipped, this year's level of activity approaches that of the 1966-1967 era.

As applied to Uniroyal and our own participation in the market place, there have been noticeable sales shifts within the commodity structure. The sales decline in lightweight asbestos fabrics continues--a trend not likely to reverse itself in the near future. This has been more than offset, however, by the increased sale of treated dryer felt yarns--and this market looks strong for at least another two years.

On 6 November 1972, the Hogansville plant instituted a broadened and improved cleaning program. The dust count levels obtained after the implementation of these revised procedures were the lowest recorded thus far. Should this trend continue, then it is reasonable to suspect that the estimated cost of Phase I can be reduced significantly.

E. A. Morris

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