CEMENT ASBESTOS PRODUCTS COMPANY

Van Buren, Arkansas

PLAINTIFF'S EXHIBIT
CAP-55

TO: ALL SUPERVISORS Date 1/12/76

FROM: Gerald Fox

SUBJECT: Respirator Program

Attached for your consideration is a copy of a new respirator program. This new program meets OSHA standards, ASARCO requirements, and our operational needs.

Bruce Klomfas has reviewed the program and has approved it for implementation. Additionally, it has been read and accepted by Jerry Fimple, and he has expressed his support for its enforcement.

Please familiarize yourself and your foremen with the program and its requirements. Our utilization of respirators is required to assure proper protection of our employees and to effect compliance with the law.

Begin training and "breaking in" your employees. February 1, 1976 will be the deadline for strict enforcement of the program.

Gerald Fox
Industrial Hygienist

GF/sb

cc: A. E. Alpine, B. Klomfas, J. Wright

RESPIRATORY PROTECTIVE PROGRAM

Introduction

It is the intent and goal of CAPCO to provide for our employees a workplace as safe and hazard free as humanly possible. This is a goal which can be met only with the complete committment and cooperation of each one of us.

In the interest of your safety and in compliance with our nation's occupational safety and health laws, this respiratory protective program is being introduced. Not only is your compliance with this program requested, it is required by law.

Equipment

All employees have available for their use and protection the Welsh Model 7170 Dust Respirator. The only time you may use a respirator other than the Welsh Model is when approved by the Safety Officer or the Plant Manager. At no time may you use a respirator other than the Welsh 7170 unless given specific permission, instruction, and training for its use.

Note 1: Some old Welsh Model 7165s, which are being replaced by 7170s, may still be in use - All parts of this program are applicable to both models.

Note 2: Some individual employees are authorized to use the Minnesota Mining Company Whitecap Life Support System for specified activities. See Appendix B for instructions concerning the Whitecap System.

Mandatory Usage

Employees are to wear a respirator as follows:

1. Whenever in an area or engaged in an activity which may conceivably expose you to airborne concentrations of asbestos or other respirable dusts equal to, or greater than, levels established by the Occupational Safety and Health Act.
2. As instructed by your foreman or supervisor.
3. During production, housekeeping, cleaning, or maintenance activities which may conceivably stir up respirable dusts or asbestos fibers to levels equalling or exceeding the levels established by law.
4. Any time there is a visible concentration of dust or particulate in your area.
5. In areas designated as respirator areas.
6. As instructed in Appendix A

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Supervisors' Responsibilities

All supervisors and foremen are specifically and individually responsible for effecting and enforcing the following:

1. Supervisors and foremen must train and instruct their employees in the proper fitting, wearing, usage, maintenance, inspection, storage, and care of respirators.
2. Instruct employees as to when respirators are to be worn.
3. Set a proper example by using your respirator as required by law and enforce proper usage of respirators by employees.

Employees' Responsibilities

All employees are specifically and individually required to:

1. Use and maintain your respirator as instructed by your supervisor, as required by this program, and as required by law.
2. Keep your respirator in a clean, sanitary condition at all times.
3. Change your respirator as necessary and dispose of old respirators in a proper manner.
4. Maintain your respirator in proper condition and repair.
5. Use and care for your respirator per the manufacturers' instructions.
6. Store the respirator properly and in the bag provided by the manufacturer.
7. Inspect the respirator regularly for proper condition.
8. Use only the respirator assigned to you - do not use a respirator that has been used by someone else.

Manufacturer's Instructions for Welsh Model 7170

A. Respirator Description

The Welsh Model 7170 Re-usable Dust Respirator is a compact, lightweight, particulate-filtering respirator which protects against inhalation of dusts. It is designed so that it can be cleaned after each use period and this permits it to be re-used several times. It shall be discarded after three (3) work shifts or whenever, even after cleaning, breathing becomes difficult due to excessive plugging of the filter by retained particulate matter.

B. Donning, Fitting, and Wearing Respirator

1. Remove respirator from plastic film bag and examine it to insure that it has not been damaged. Save bag for reuse.
2. Position respirator on face so that wide portion of facepiece is over chin and narrow portion of facepiece is over nose.
3. Place lower headband straps around head below ears and fasten hook and eye together.

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4. Place upper headband straps around head above ears and fasten hook and eye together.
5. Adjust tension in headband straps to provide tight seal of facepiece to face and yet allowing comfortable wearing of respirator.
   a. Tension in straps may be increased while wearing respirator by grasping ends of headband straps between thumbs and forefingers and pulling on straps or by holding hook or eye with thumb and forefinger of one hand and pulling strap through hook or eye with thumb and forefinger of other hand.
   b. Tension in straps may be decreased while wearing respirator by holding hook or eye with thumb and forefinger of one hand and pulling strap through hook or eye with thumb and forefinger of other hand.
6. Check for tightness of seal of facepiece to face by inserting tip of small finger through circular hole in respirator valve guard and pushing exhaltion valve flap against the exhalation valve seat to close exhalation valve. Exhale gently while keeping exhalation valve closed. If leakage of exhaled air is detected to be passing between facepiece and face, adjust position of facepiece on face and/or adjust tension of headband straps, and then re-test for tightness of seal of facepiece to face is adequate.
7. Periodically check tightness of seal of facepiece to face while wearing respirator and make adjustments if necessary.

C. Cleansing and Sanitizing Respirator

1. Clean and sanitize respirator after each day of use.
2. Remove deposit of dust particulate matter from outer surface of respirator filter by brushing off particulate deposit (clean paint brush is suitable). The brushing operation should be carried out inside ventilated hood to prevent inhalation of dust particulate matter.
3. Use clean, non-linting cloth wetted with Welsh Detergent-Sanitizer or any suitable detergent-sanitizer solution to cleanse and sanitize respirator. Use wetted cloth to wipe surfaces of respirator facepiece, headbands, exhalation valve guard, and exhalation valve by wiping. Do not wipe surface of filter.
4. Use clean, non-linting cloth wetted with clean water (preferably distilled or demineralized water) to rinse surfaces of respirator facepiece, headbands, exhalation valve guard, and exhalation valve.
5. Allow respirator to dry in clean air at normal room temperatur

D. Storing Respirator

1. Place cleansed and sanitized respirator into plastic film bag.
2. Store respirator so that it is protected against dust, chemicals, moisture, excessive heat, and physical damage. Prevent distortion of respirator during storage.

E. Respirator Inspection

Inspect respirator thoroughly before each use to insure that it is in satisfactory operating condition. Discard respirator if damaged or if parts are missing.

F. Respirator Replacement

Discard respirator and replace it with a new respirator after three (3) work shifts or whenever, even after removal of retained dust particulate matter from respirator filter, breathing becomes difficult due to excessive plugging of filter by particulate retained within fibrous filter material.

Final Notes

Remember, respirators do no good and offer no protection if:

1. They are not used
2. Are merely worn dangling around the neck
3. Are not maintained properly
4. Do not fit properly

Please, for your own safety and protection, observe the requirements and instructions of this respirator program.

Notify your foreman or supervisor immediately if you are experiencing any problems or have any questions concerning your respirator.

Gerald Fox
Safety Officer

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APPENDIX A

Employees must wear respirators while performing the following work tasks or while working or passing within close proximity (approx. 15 feet) of others performing these work tasks or operating these machines:

1. MEE and MOA Lathes
2. Coupling Cut-Off
3. Finishing Line Lathes
4. Coupling Lathes
5. Rework Saw
6. Tapping Drill
7. A/C Crusher
8. Batch Mixer
9. Vacuum Operators
10. Maintenance, Cleaning, or Unclogging of Bag Houses and Dust Collection System
11. Maintenance, Cleaning, or Unclogging of Mixing/Blending/Willowing/Cyclone Separator Systems
12. Working Inside Silos
13. Housekeeping Activities which may conceivably stir up asbestos or other respirable dusts to levels equal to or exceeding the levels established by law.
14. While engaged in or near any activity which may stir up asbestos or other dusts to levels equalling or exceeding the levels established by law.
15. Whenever working in or near an area where dust or particulate in the air is visible.
16. Whenever instructed by your supervisor.
17. Whenever it is readily apparent by reason of experience or common sense that you should be wearing a respirator.

This list is subject to periodic revision when testing, sampling, or other research indicates need for addition or deletion.

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