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Inter Company Correspondence

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D. P. Glazier	Industrial Hygiene	Employee & Indus. Relat.	Chrysler Center	417-05-19

Subject: U.A.W. ASBESTOS SURVEY

Attached for your review is the Industrial Hygiene Report to the UAW Trenton Chemical Plant Asbestos Survey.

D. P. Glazier
Industrial Hygienist

hm
Attachment

cc: F. A. Burnett
G. D. Benson
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INDUSTRIAL HYGIENE REPLY TO THE UAW
TRENTON CHEMICAL PLANT - ASBESTOS SURVEY

I GENERAL

A. Posting

OSHA Rules and Regulations do not require posting in areas where airborne asbestos concentrations are not in excess of the maximum allowable limit. (Currently 5 fibers/cc, July 1, 1976 2 fibers/cc)

If posting were required, the sign specifications required by OSHA would be as follows:

Asbestos
Dust Hazard
Avoid Breathing Dust
Wear Assigned Protective Equipment
Do Not Remain In Area Unless
Your Work Requires It
Breathing Asbestos Dust May
Be Hazardous To Your Health

In addition, we believe that the [illegible] posting of areas which have low airborne asbestos fiber concentrations [illegible] from the effectiveness of OSHA required posting [illegible] where the airborne concentrations are, in fact, [illegible] the allowable limit.

B. Containers

Industrial Hygiene believes that labeling [illegible] for asbestos containing materials which [illegible] modified by a bonding agent, coating, binder or other material which will prevent the release of an excessive airborne concentration of asbestos fibers (i.e., in excess of the maximum allowable limit).

C. Ventilation Indicators

Industrial Hygiene agrees that, "where feasible, there should be an interlock to prevent the operation of equipment without ventilation." However, in relation to visible ventilation indicators, we believe that while it is not difficult for an operator to determine whether an exhaust system is in operation, it may be very difficult for the operator to determine whether or not the system is "performing adequately." Performance evaluations should be the responsibility of the appropriate engineering personnel, who have the required technical expertise.

D. Housekeeping

Industrial Hygiene agrees that meticulous housekeeping standards are necessary in order to prevent accumulations of asbestos fibers which could create excessive airborne concentrations upon their dispersion. However, we believe that janitorial manpower and scheduling decisions are the responsibility of the plant management.

E. Cleaning Methods

While OSHA Rules and Regulations state that wet methods shall be used only, "insofar as practicable" for the control of airborne asbestos concentrations, the Corporate Asbestos Review Guide states that, only vacuum cleaning methods and wet sweeping shall be used to collect asbestos fibers.

F. Work Clothing

Section 1910.93a (d)(3) of the Federal Register stipulates that, "the employer shall provide, and require the use of special clothing, such as coveralls or similar whole body clothing,..... for any employee exposed to airborne concentrations of asbestos fibers which exceed the ceiling level," (10 fibers/cc). The more stringent Corporate standard provides that protective clothing must be provided and worn by all employees exposed to concentrations of asbestos fibers which exceed the Permissible Exposure Level, (currently 5 fibers/cc). In addition, the Corporation provides disposable aprons to those employees who work in areas where their personal clothing may come in contact with loose asbestos dust. It is therefore evident that Chrysler Chemical has achieved more than simple compliance with the OSHA Regulation, and we believe that the plant has, in fact, provided protective garments for those employees whose personal clothing may tend to become contaminated with asbestos fibers.

G. Monitoring Observations

Historically the Industrial Hygiene Department has attempted to notify the local Union Health and Safety Representative of our survey intentions upon our entry into the plant. We have no objection to being accompanied by a local union safety representative during regularly scheduled asbestos surveys, but it should be noted that the Health and Safety Memorandum of Understanding provides that the Health and Safety representative will be excused from his job without loss of pay, only on the following occasions:

1) to accompany Governmental Health and Safety inspectors

2) to accompany International Union Health and Safety professionals on plant tours and Corporate Health and Safety professionals on Union requested surveys

The Industrial Hygiene Department has not provided the local union safety representative with a copy of an individual employee's notification of over-exposure to asbestos dust, because there is no agreement to this effect mentioned in the Memorandum of Understanding.

In regard to the wording of the employee over-exposure notification letter, we do not object to pointing out in the body of the letter that his exposure exceeded allowable limits, but we do object to providing the employee with the numerical result of the air sample analysis. We believe that the evaluation of air sampling results should be the responsibility of a professional industrial hygienist, who has the knowledge and experience required to put this type of information in the correct perspective.

H. Receiving of Asbestos Shipments

Industrial Hygiene agrees with Dr. Mirer's recommendations regarding the receiving of asbestos shipments.

II FRICTION PRODUCTS BUILDING

A. Weigh-Up Station

OSHA regulations require that asbestos waste must be disposed of in sealed impermeable bags when disposal may produce, "in any reasonably foreseeable use," an airborne asbestos fiber concentration which is in excess of the allowable limit. In regard to the above requirement, Industrial Hygiene feels that asbestos waste should be disposed of in impermeable bags rather than by attempting to control airborne levels by installing local exhaust ventilation for the waste containers.

In relation to point #2., see our ventilation indicator comments listed under I. C.

We have no objection to providing covers for transport carts, but it should be noted that such covers would provide only marginal effectiveness, because they would have to be removed prior to skip hoist loading.

B. Lodige Mixers

Industrial Hygiene agrees with Dr. Mirer's housekeeping and maintenance recommendations for the Lodige mezzanine. However, we do take exception to point #2. Air sample results have shown that the dust which is seen to escape from the skip hoist when the loading cart is turned upside down, is composed mainly of non-asbestos particulate. We believe at this time that the use of additional engineering controls to prevent airborne dust at the Lodige skip hoist, would not prove to be a cost effective control measure.

C. Bipel Press

Industrial Hygiene believes that much of the recent increase in employee exposure to airborne asbestos dust at the Bipel work stations is due to haphazard handling of the loose disc brake pad material. If administrative controls cannot reduce the magnitude of employee exposure to asbestos dust at the Bipel work stations, additional engineering controls will have to be evaluated. A problem, which should be noted, is that the installation of high capture velocity local exhaust ventilation at the Bipel work stations could result in underweight pads, because of the related loss of the loose disc brake pad material through the exhaust system.

In regard to protective clothing, note our comments listed in Section I, F.

D. O.E.M. Grinders

We have no objection to Dr. Mirer's comments regarding interlocks

and to the determination of the operator's noise exposure, but we feel that his recommendation that the plant engineering function report to the health and safety representative is plainly beyond the scope of the memorandum of understanding.

E. Saw Area

F. Hammermill Mezzanine

G. Air Cleaning Equipment

Industrial Hygiene has no objection to Dr. Mirer's comments as listed in Sections II, E., F., and G. of his report.

III CHEMICAL PLANT

A. Downstairs Weigh-Up Station

As regards posting, please refer to our comments as listed in Section I, A. Industrial Hygiene has no objection to obtaining an air sample at the downstairs weigh-up station. This operation involves the weigh-up of less than one bag quantities of asbestos on an approximately once per week basis.

B. Storage Area

See our reply as listed in I. H.

C. Mezzanine Weigh-Up Station

We have no objection to Dr. Mirer's comments on housekeeping. See Section I. A., for our posting recommendations.

D. Mixers

We do not concur with Dr. Mirer's posting recommendation (see I. A.). Industrial Hygiene has no objection to the housekeeping and maintenance recommendations.

D. P. Glazier
Industrial Hygienist