

REPORT OF TELEPHONE CONTACT AND VISIT OF ALICE HEINRICH
DEPARTMENT OF LABOR OSHA

At 2:50 PM on September 22, 1976, Alice Heinrich, Safety officer with the Department of Labor, Federal OSHA, called E. Lombard to inform him that her office had received a C.A.S.P.A. complaint against the State of Michigan Safety Administration by an employee at the Trenton Chemical plant. She stated that the employee who sent in the complaint contended that the state inspection was not adequate and that the state compliance officer had failed to cite the company for: (1) Management not allowing all the monitoring to be observed by employees; (2) Signs were not posted in areas where asbestos was in excess of the rule; (3) The signs which were posted were not adequate in wording or size; (4) The company was not labeling containers with asbestos material when transferred from one container to another; (5) Failing to give annual x-rays and medical exams to all employees exposed to asbestos; and (6) Not x-raying employees when terminated or transferred.

She stated that there were eleven areas which she had been informed were not monitored. These are; # 4 Lodige, Hammermill deck; 1,2,3, Readco mixers; # 4 Churn; # 5 Churn; Receiving docks both plants; Warehouse - Chemical Bldg.; Grinders brake pads; Compactor - Chemical; Storage area - F/P; and Entrances to plant. She explained that the Department of Labor would not cite the company unless there was an immediate danger or serious violation. Any enforcement would go back through the State agency.

E. Lombard explained to Ms. Heinrich that according to the Memorandum of Understanding negotiated with the Union there were specific surveys which when made would allow the Union Health and Safety Representative to be released from his job to monitor air sampling.

The signs are posted as required in the standard in the areas where the exposure could be above the threshold limit value. The containers of asbestos brake shoes are not labeled because the asbestos is in a binder.

The employees exposed to asbestos do receive annual x-rays, pulmonary function tests and medical examination. Ms. Heinrich stated that she had a list of employees who had not received x-rays as required under the law.

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She gave the name of Gary Sova as one of these names. I explained that Mr. Sova was a fork lift truck operator in the Chemical Plant and in the opinion of management was not exposed to asbestos, although he did transport limited amounts of asbestos in plastic bags throughout the plant. Ms. Heinrich said that she would probably visit the plant to review our records and that we would hear from her later.

On Thursday, September 23, 1976, Ms. Heinrich arrived at the plant at 1:00 PM to review the results of air sampling and records on physical examinations for employees exposed to asbestos during their work. She was taken to the Personnel Manager's office where she presented a copy of the complaint about the State program administration to L. Andre, T. Lang and E. Lombard. A copy of the complaint is attached. Ms. Heinrich explained that she was following up on the complaint to make a report to the Chicago office on the results of her investigation for their appropriate action. She pointed out that she had been involved with the people who had submitted the complaint and had discussed the subject with them. They seemed to have a real concern about the asbestos exposure and believed that they were entitled to have access to the monitoring records. She stated that she had talked with the Chicago office regarding posting of the required signs in any area where there was exposure to asbestos and had been told that a sign is needed only where there has been an over exposure at one time. On the basis of the State findings, she explained the company did not need to post signs in those work areas.

She checked the records that showed pulmonary functions and x-rays had been taken of employees, specifically asking for the dates of x-rays for G. Pickrell, G. Sova, W. Tipper and W. Molchan. The Medical Department was contacted and their records indicated G. Pickrell's last x-ray was in 1972, G. Sova's was in 1975, W. Tipper's was on 4-15-75 and W. Molchan's was in 1968. It was pointed out to Ms. Heinrich that these people were not employed in the Friction Products operation and had minimal exposure to asbestos. In order to inform her of the quantity of asbestos handled by Mr. Pickrell on his job, R. Campbell Production Superintendent showed her the batch cards for the products using asbestos in the Chemical plant indicating that there were 4 to 6 bags, approximately 140 lbs. used at the # 1 Readco, # 4 and 5 churns.

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She picked names at random from the records to show when an x-ray had been taken. She asked for a copy of a letter setting up a special time for chest x-rays to be taken at the Trenton Engine Medical Department. Ms. Heinrich was informed that all employees had been told during a Safety Awareness meeting that x-rays, blood tests and pulmonary function tests would be given to anyone who requested them, even though they were not working with asbestos.

She reviewed the air sampling results on the semi-annual asbestos surveys for 1976, 1975 and 1974. She also reviewed the Memorandum of Understanding Health and Safety agreed to between Chrysler Corporation and the UAW in 1973. In regard to the employee observation of monitoring she stated that the standard read "affected employees or their representatives shall be given a reasonable opportunity to observe any monitoring required by this paragraph and shall have access to the records thereof".

She believed that under this paragraph the Company should give monitoring results to the Union. The paragraph in the Memorandum of Understanding regarding surveys of the plant by the Corporate Health and Safety staff where such survey reports will be provided to the International Union was shown to Ms. Heinrich to support the plant's policy of having Corporate Industrial Hygiene send the reports to the International Union as required rather than doing it at a local level. She was told that the air sampling results had been sent to Dr. Franklin Mirer by Chrysler Corporate Industrial Hygiene office.

Ms. Heinrich closed her discussion and review explaining that the results of her visit would be sent to the Chicago office for whatever action they deem necessary. She left the plant at 4:00 PM.

E. R. Lombard
E. R. Lombard

ERL:nsc
9/27/76

3. Region Office
(Address)

COMPLAINT ABOUT STATE 10(b) PROGRAM ADMINISTRATION

1. This form is provided to assist you in the filing of your complaint about the administration of the State's Occupational Safety and Health Program. Your complaint, however, must be based on facts directly related to the following:

1. Action(s) which took place at a specific time and place.
2. Action(s) which you believe indicate inadequate administration of the State Occupational Safety and Health Program.

2. Date of Incident	3. State <i>Michigan</i>	4. County	5. City <i>Trenton</i>
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6. Street Address Where Incident Occurred

5437 W. Jefferson

7. Name of Employer or Name of Place Where Incident Occurred, If Applicable

Chrysler Chemical Division

8. Name(s) and Occupation(s) of Persons Involved in Incident, If Applicable

9. Describe the Incident which caused your complaint.

10. Name(s) of Person(s) Submitting Complaint (will be withheld upon request)

11. Telephone where you can be reached for more information	12. Date This Form Completed
Area Code: No. Ext.	<i>8-11-76</i>

13. Address No., Street, City and State, Zip Code

14. ☐ Do Not Reveal My Name ☐ You May Reveal My Name During Investigation

15. This State Agency ☒ Has ☐ Has not been Furnished this Data

16. Signature of Person Filing Report

OSHA Form # _____

(Mail to Regional OSHA Office)

hazard.

I feel the state compliance officer when he visited and
S.P. A. complaint did monitoring in the plant we all work in failed to site
Chrysler Chemical in regards to the following sections
the law 1910.1001 paragraph F # (4) employee Observation of monitoring paragra-
G # (1) Caution signs and labels (i) posting (ii) sign specifications G # (2)
belonging J # (3) Medical Examinations and J # (4) Termination of employment.

During the states visits to our facilities it was pointed out verbally on several
occasions (1) That mgmt. was refusing to allow all employees to observe all
monitoring results it was explained that it was managements opinion that only
employees they monitored they would allow to review the results of such monito-
ing this was there interpetation of employees affected. (2) Caution signs were
not being posted in areas where asbestos could of and has been released into the
air in excess of paragraph (b) of the rule. (3) Some of the signs that management
is installing in areas of the plant did not comply with sign specifications (4)
management was not labeling containers when transferring asbestos material from
one container to another (5) It was pointed out that management was failing to give
employees anual medical examinations (X-Rays) (6) Finally they were not X-
raying employees who terminated there work temporarily (Continue on reverse side if necessary)
asbestos operations.

D.L. ✓ J. Lombard

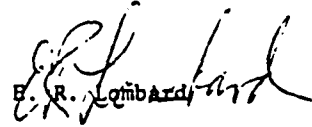
REPORT OF PLANT VISIT MICHIGAN DEPARTMENT OF PUBLIC HEALTH ENGINEER

On Friday, February 21, 1975 at 10:35 a.m. Mr. Emanuel Ferruzzi, Engineer, with the Division of Occupational Health, Bureau of Industrial Health, Michigan Department of Public Health arrived at the plant. He presented his identification card and informed me that he was visiting the plant on a routine visit, not in response to a complaint of an employee or the Union, and wished to make a complete tour of the plant. He explained that his interest was in the area of employee exposure to toxic materials or health hazards and would not be looking for safety items. The Corporate Safety Department was notified concerning the visit while I was talking with Mr. Ferruzzi. He proceeded to review all the OSHA 100 logs for 1974 stating that he was looking for occupational illnesses to determine whether there were certain areas presenting toxic exposures to employees. No definite pattern of exposure was found in the individual cases he examined. After obtaining information on employment and Union representation, ~~he~~ ~~talked with a Union representative, Gary Pickrell, the Union Health and Safety representative, was released from work to meet with Mr. Ferruzzi~~ who explained the reason for his visit to the plant and pointed out that no report on the visit would be sent to the Union. He asked Gary Pickrell to inform him of any problem areas that should be observed. At 11:45 a.m., Mr. Ferruzzi completed his talk with Gary Pickrell and made arrangements to return at 12:45 for a plant tour.

At 1:00 p.m., ~~Mr. Ferruzzi~~ and ~~G. Pickrell~~ started on a ~~tour~~ of the entire operations with Mr. Ferruzzi. We started in the Chemical Products paint area which he wanted to see and covered the complete building except for the laboratories and offices. We continued through the maintenance area and powerhouse where a sound level reading was made. The reading was below 90 dba. Then through building 20 and to Friction Products completing the tour with a visit to waste treatment and the oil buildings. At the suggestion of Gary Pickrell, he returned to Chemical Products to take a sound level reading at #2 rubber mill. The reading was above 90 dba. Prior to leaving Mr. Pickrell at 3:15 p.m., Mr. Ferruzzi informed him that he planned to return to make air sample tests.

At the exit interview, Mr. ~~Ferruzzi~~ explained to George Hill, John Lardie and Elmer Lombard that he was unable to make any judgment on the employee exposures without samples, therefore, he ~~planned to return~~ for 2 days within the next few months to ~~take~~ ~~samples~~ in Chemical Products, especially in the area of paints and adhesives and in Friction Products extruder area to check the exposure to solvents such as toluene, MEK, MIBK, butyl alcohol, monochlorobenzene as well as asbestos exposures in both locations. He said that he would ~~attempt~~ ~~checks~~ of asbestos exposure in ~~Friction Products~~, not ~~a complete survey~~, because the operation essentially has not changed since the last survey 2 years ago when the exposure to asbestos was below the TLV. He discussed the possibility of making an analysis of blood from employees for lead rather than attempt to take an air sample which might not give an accurate exposure.

He commented on the design of the exhaust ventilation hoods suggesting that a hinged cover be installed to improve the efficiency of the hood in capturing solvent vapors. He pointed out that the sound level reading at the #2 rubber mill was above 90 dba, therefore, employees at that location must wear hearing protection and a sign to designate that hearing protection is required should be posted until the cause of the high sound level can be found and corrected. He also indicated that he was interested in checking for possible vinyl chloride exposure. The meeting was concluded at 4:00 p.m. when Mr. Ferruzzi left the premises.


E. R. Lombard