

COMMENTS ON ABT DRAFT OF
TRAINER'S GUIDE FOR BRAKE SHOP MANAGERS

PLAINTIFF'S EXHIBIT

MAR-147

Page 15

The presentation on cancer is quite simplistic, which may be okay for the purpose of this guide; but it does not seem quite right to present mesothelioma the way this text does. It makes it sound as though mesothelioma is a kind of lung cancer which is not correct.

The closing statement that mesothelioma "is extremely rare except among people exposed to asbestos" makes it sound as though mesothelioma is common among people who have been exposed to asbestos, and this really isn't the case. Mesothelioma is rare even among people exposed to asbestos.

Page 19

I think this discussion should include a description of how inhaled fibers are rejected from the respiratory tract and swallowed in saliva. I believe this is the primary means of fiber entering the digestive tract.

The discussion should include remarks on the effects of smoking on the respiratory rejection mechanism.

Page 21

The word "smokers" in the third line of the first paragraph should be changed to "asbestos workers who smoke."

I question the validity of the statement "almost every case can be traced to the victim having been exposed to asbestos" in reference to mesothelioma. I believe most recent information indicates a significant incidence of mesothelioma cannot be traced to exposure to asbestos.

Page 23

I also question whether the statement on autopsys and mesothelioma "they almost always find high concentrations of asbestos fibers" is correct. I thought many mesotheliomas were associated with low fiber exposures, and presumably, low concentrations of fiber in the lung tissue.

Page 24

It should be pointed out that dust levels shown for beveling lining are for uncontrolled operations.

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(10)

ABT DRAFT (Continued)

Page 32

The illustration of the industrial hygienist taking a sample as shown on the right hand side of slide 11b is not a valid representation. Asbestos samples usually are taken with a worker wearing the sampling apparatus, or by taking a stationery sample with the pump mounted on a stand or merely resting on a stationery surface. I have never known an asbestos sample to be taken in the manner illustrated. It is important this illustration be shown correctly, as it appears numerous times on other slides shown throughout the Abt Drafts.

Page 37

Item 2 regarding grinding used truck linings is incorrect. Lining is not ground "to remove grease and dirt." Grease and dirt usually are removed by solvent vapor degreasing or a caustic wash or by exposure to very high temperature. If arc or radius grinding is done to achieve exact fit of lining to drum, exhaust control is needed to avoid generation of excessive airborne fiber levels.

Page 38

Slide 13 escapes me. The grinder shown is not typical of types commonly used for brake service work. Nor is the one shown on Slide 12 on page 36.

I simply can't tell what the guy on the right side of the slide is doing with what looks like a hose.

Page 42

On Slide 14 it would be better to show the drum lying on the floor and the backing plate assembly mounted on a vehicle axle, as this is usually where these items are when they are cleaned.

The grinder shown on Slide 15 is not typical of grinders used for arcing or beveling brake linings.

Page 43

The remarks regarding Slide 14 should include wet spray cleaning and/or wiping with a damp cloth as alternates to vacuum cleaning.

Page 45

The conclusion of the remarks regarding Slide 15 should allow a dust ventilation system as an alternate to a vacuum cleaner. A

ABT DRAFT (Continued)

Page 45 (continued)

dust system with proper hooding, duct work, fan and dust collector actually is better than a vacuum cleaner for medium sized and large shops.

Concerning Slide 16, I prefer "removed" to "disabled" in reference to compressed air nozzles in shop areas as mentioned in the final sentence of this paragraph.

Page 48

The grinder shown on Slide 20 is not typical. Long flexible hose as shown on this slide and Slides 13 and 15 should not be used for stationery equipment because of excessive friction loss and lower durability than metal duct work.

Page 51

I suggest the "plastic bags" referred to be given some qualifications such as heavy duty, heavy wall, or some similar characterization. The way also should be kept open for using dust-tight containers other than plastic bags.

Page 56

I question whether the three types of respirators illustrated are really characteristic of what normally is used in asbestos operations. I've never seen anyone use a full face piece mask, and the dual filter half face piece masks are only rarely used. Our people usually prefer the lighter weight, smaller single filter half face masks or a disposable type of mask. I don't believe the belt mounted type of powered respirator shown is presently approved or available in this country. Perhaps they should consider changing this illustration to show a back mounted powered respirator, which I believe is approved and available.

Page 57

I question whether the last paragraph regarding supplied air versus filter respirators is factual. Supplied-air respirators must be continuously connected to an air supply hose, which can be a cumbersome uncomfortable nuisance to the worker. In most cases I should think a worker would prefer a good filter respirator for exposure levels within its limitations.

Page 59

Reference is made to the ANSI guidelines for a respirator program.

ABT DRAFT (Continued)

Page 59 (continued)

These are generally quite good, but I don't like the ANSI instructions for testing respirators for fit. I think they are impractical for field use by asbestos construction and/or production workers in some respects.

The reference to problems from clothing exposure appear unnecessarily alarming for low level exposures. I think this paragraph should point out that problems of this nature only occur where exposures are high.

Page 64

The illustration of the industrial hygienist taking sample as shown on the right hand side of Slide 29 is not a valid representation. Asbestos samples usually are taken with a worker wearing the sampling apparatus, or by taking a stationery sample with the pump mounted on a stand or resting on a stationery surface.

Page 71

Is 20 years long enough for medical record storage? I thought this was changed to at least 40 years.

Page 74

I suggest "wet processing" be added to "vacuum lines" as a method of engineering control shown on Slide 41.

I think it might be better to list the following three items under engineering controls in place of "vacuum lines" on this slide:

1. Isolation
2. Ventilation
4. Wet Processing