



ENGINEERING REPORT

for

GENUINE PARTS COMPANY
RAYLOC DIVISION
HANCOCK, MD

January 21, 1992

prepared by

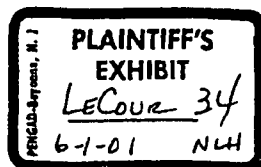
TheTravelers

David W. Glassman
Engineering Specialist - Industrial
Hygiene & Environmental Services Unit
Baltimore, MD

**THE TRAVELERS
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P-C Commercial Lines
Loss Prevention and Engineering

250 W. Pratt Street
Suite 920
Baltimore, MD 21201
February 18, 1992

Mr. Ron Shives, General Manager
Genuine Parts Company
Rayloc Division
100 Rayloc Drive
Hancock, MD 21750

Dear Mr. Shives:

This confirms my survey of your facility to evaluate employee exposure to airborne asbestos fibers. This evaluation was done as part of an ongoing evaluation of controls implemented to reduce the employee exposure.

The results of the survey are contained in the attached report. Thank you for your cooperation, if you have any questions feel free to contact me.

Sincerely,

David W. Glassman
Engineering Specialist -
Industrial Hygiene &
Environmental Services Unit
410 962-6453

This report is based upon the information supplied by company personnel and/or the conditions and practices we observed at the time of the visit. The report may not list all unsafe conditions and practices; others may exist. This report is not an endorsement of and it may not be used to endorse or promote any practices, procedures or products. Surveys and recommendations made by The Travelers are advisory and designed to assist customers in the maintenance of their own safety activities. Recommendations are not designed or intended for any other purpose. The Travelers is not responsible for making changes in the operations/procedures of the location or for implementing any recommendations. Boilers, pressure vessels and machinery are inspected only for conformance with jurisdictional laws, regulations and/or Travelers underwriting requirements. C-19102(R491)

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Distribution:

Orig: As Addressed

- 1 cc: Mr. John Aderhold
Division Manager
Genuine Parts Company
Rayloc Remanufacturing Division
600 Rayloc Drive, SW
Atlanta, GA 30378
- 1 cc: Mr. Richard Geiger
Director - Insurance and Audits
Genuine Parts Company
2999 Circle 75 Parkway NW
Atlanta, GA 30339
- 1 cc: Mr. Edward R. Holben
Loss Control Consultant
Alexander & Alexander, Inc.
3565 Piedmont Road NE
Atlanta, GA 30363
- 1 cc: Mr. Jerry Jordan
The Travelers Companies
Loss Prevention & Engineering
211 Perimeter Center Parkway
Atlanta, GA 30346
- 1 cc: Ms. Lisa Beegle
The Travelers Companies
Loss Prevention & Engineering
3110 Fairview Park Drive
Falls Church, VA 22042-4503
- 1 cc: Mr. Michael McClure
Manager - Industrial Hygiene & Environmental
Services & Product Safety Unit
The Travelers Companies
Loss Prevention & Engineering
One Tower Square - 248-CP
Hartford, CT 06183-4070
- 1 cc: File - David W. Glassman

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I. Executive Summary

A. Introduction

This survey was requested as follow up to sampling preformed in October, 1990. That sampling indicated high exposures to asbestos in the Burner and Chopper operations. Additional controls were added to those operations which established the need for a reevaluation of the employee exposure to asbestos.

I conducted sampling in the same areas as my previous survey. This is to permit a comparison of the results as a means of measuring the effects of the controls put in place to affect the employees exposure to asbestos.

B. Purpose

The purpose of the sampling was to determine the employee exposure to asbestos. By comparing these results to previous results, the effectiveness of the controls, put in place since the previous sampling, can be evaluated.

C. Conclusions

The personal air sampling indicated employees in the Disk Brake Riveting, Midas Belt, Clutch Disk Drilling, and Burner operations are exposed to fibers in excess of 50% of the Action level of 0.1 fibers per cubic centimeter of air. The levels in the Midas Belt, Disk Brake Riveting, and Clutch Disk Drilling were higher than the previous sampling.

The controls put in place in the Chopper and Burner areas have lowered the exposure in those areas. However, the Burner area needs additional controls to further reduce employee exposure to asbestos.

Until controls are in place throughout the facility, which will ensure that the employee exposure to asbestos levels are acceptable, a formal Asbestos Exposure Control Program should be implemented in accordance with OSHA 1910.1001.

II. Findings and Recommendations

A. Observations

Engineering controls had been added to the burner room since my previous survey. An enclosed exhaust ventilation system was added to the sorting belt. The burning area was isolated from the rest of the room, where the operator spends most of his time. This contributed to the reduction in exposure to the operator in this area.

An operational change was made in the chopper area to reduce the exposure there. The parts dumping operation was changed to reduce the generation of dust in the employee breathing area.

B. Sampling Results

The personal air sampling for airborne asbestos fibers indicate exposures above 50% of the Action Level for the Disk Brake Riveting, Midas Belt, Clutch Disk Drilling, and Burner operation areas. The results are summarized below and detailed in the Appendix.

<u>Employee</u>	<u>Operation</u>	<u>8-Hr. TWA (fibers/cc)</u>
R. Helmick	Burner Operator	0.085
J. Bechtol	Midas Belt Operator	0.085
A. Appel	Clutch Disk Driller	0.074
R. McMullen	Disk Brake Riveter	0.067
R. Unger	Chopper Operator	LT 0.034

C. Sampling Methods

The air sampling was performed during normal working procedures and conditions. The sampling was performed to determine personal exposure to airborne asbestos fibers in each area. The sampling equipment consisted of battery powered air sampling pumps, which draw air through a sampling media at a predetermined flow rate. The flow rate was monitored by means of a rotometer, and calibrated prior to use by a primary mass flow meter. The collection media for asbestos fibers is a 25mm Millipore filter. For details of the equipment and other pertinent data, refer to the "Industrial Hygiene Data Sheets" found in the Appendix.

The samples were sealed and sent to The Travelers Engineering Lab in Hartford, Connecticut, for analysis. The analytical methods used are indicated on the "Laboratory Analysis Reports" found in the Appendix.

The standard for asbestos has been established by the Occupational Safety and Health Administration (OSHA) under section 1910.1001.

D. Recommendations

IH 88-2 Asbestos Exposure Control Program

IMPORTANT (Originally submitted 11/4/88)

A formal Asbestos Exposure Control Program should be developed and implemented in accordance with OSHA 1910.1001. This program should address the following provisions:

1. Feasible engineering controls and/or work practices should be developed and implemented to reduce and maintain employee exposure at or below the permissible exposure limit. Engineering controls include isolation, local exhaust ventilation, process enclosures, dust collection systems, etc. Work practice controls include wet methods, prohibiting the use of compressed air for cleaning activities, etc. Job rotation is not an acceptable means of employee exposure control.
2. Personal protective equipment must be provided and used by employees until engineering controls or work practice controls can be effectively implemented. Personal protective equipment required should include:
 - a. Approved, cartridge-type respirators should be provided for and used by employees. Also, a formal Respiratory Protection Program in accordance with OSHA 1910.134 should be implemented immediately.
 - b. Special clothing including coveralls, head coverings, gloves, and foot coverings should be provided and used by employees immediately.

- c. Warning signs should be provided and displayed in each area where airborne asbestos fiber concentrations are in excess of the permissible exposure limit.
- d. Affected employees should be notified in writing regarding the sampling results within fifteen working days after the receipt of these sampling results. This written notification should contain corrective action being taken by the employer to reduce employee exposure to at or below the permissible exposure limit wherever sampling results indicate that the permissible exposure limit has been exceeded.
- e. A Medical Surveillance Program should be implemented for all employees who are or will be exposed to airborne concentrations of asbestos fibers at or above the Action Level. Before an employee is assigned to an occupation or exposed to airborne concentrations of asbestos, a preplacement medical examination should be provided. This examination should include, at a minimum, a medical and work history, a complete physical examination of all system with emphasis on the respiratory system, cardiovascular system, and digestive track, completion of roentgenogram, pulmonary function tests to include forced vital capacity and forced expiratory volume at one second, and any additional tests deemed appropriate by the examining physician. Follow-up medical examination should be provided on an annual basis.
- f. Clean change rooms with shower facilities and isolated lockers should be provided for employees who work in areas where airborne asbestos fibers are present at or above the permissible exposure limit. Also, laundering service for contaminated clothing should be made available to all employees who work in these regulated areas.

- g. A Training Program for all employees who are exposed to airborne concentrations of asbestos at or above the Action Level should be developed and implemented. This Training Program should include provisions for discussing the health effects associated with asbestos exposure, the relationship between smoking and exposure to asbestos, the quantity and location of asbestos, the specific nature of operations which could result in exposure to asbestos, engineering controls and work practices associated with employees job assignment, proper use of personal protective equipment, the Medical Surveillance Program, the provisions of OSHA 1910.1001. This Training Program should be repeated annually. Records should be maintained on file to document all training sessions.
- g. Resampling to evaluate employee exposure to asbestos should be conducted at least semi-annually. Also, resampling is adjusted to ensure that any engineering controls implemented are effective in reducing employee exposure to asbestos.

These are minimum requirements of the OSHA Asbestos Standard. To ensure compliance with this legal standard, a review of OSHA Standard 1910.1001 should be conducted. A copy of this Standard was provided with a previous report from the sampling performed February 28, 1989.