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Int' Company Correspondence

To-Name & Department		File Code	Date	Division	Plant Name	CMS Number
S. C. Enders	Plant Manager	Stamping & Assembly	June 23, 1976	Trenton	Chemical	453-03-00
From-Name & Department		Division		Plant Name		CMS Number
D. P. Glazier	Industrial Hygiene	Employee & Ind. Relations		Chrysler	Center	417-05-19

Subject: SEMI-ANNUAL ASBESTOS SURVEY

In compliance with Section 1910.93a, (f), of the OSHA Rules and Regulations, the writer conducted an investigation of employee exposure to airborne asbestos dust at the Trenton Chemical Plant during the month of May. The individual results of this survey are listed opposite the corresponding job or area location on the attached data sheets. It should be noted that samples (2), (23), (36), (45) and (51) were obtained concurrently and immediately adjacent to air samples collected by Mr. C. Fedoranko of the Michigan Department of Public Health during the MIOSHA investigation conducted on May 20, 21 and 26, 1976.

While none of the air samples obtained indicate employee exposure in excess of the current OSHA permissible exposure level, ~~some problems do exist~~ in regard to compliance with the July 1, 1976, ~~current OSHA standard~~. The ~~Bipel Press~~ operations have ~~caused~~ ~~significant~~ employee exposure to airborne asbestos dust. Borderline control exists at the #1 and #2 Bipel presses; but employees stationed at the #3, #4 and #5 Bipel presses were found to have asbestos exposures which are in excess of the July 1, 1976 allowable limit. It is evident that ~~adequate controls which as placed~~ have failed to adequately control airborne asbestos dust levels at the Bipel press work stations. Industrial Hygiene ~~believes~~ that ~~installation~~ of the individual ~~Bipel~~ ~~mix~~ ~~trays~~ ~~and~~ ~~scales~~ in an ~~enclosed~~ ~~hood~~ would provide ~~adequate control~~ of airborne asbestos dust at the Bipels. This or another technically feasible engineering control measure which would provide uncontaminated air to the individual Bipel press operator's breathing zone should be investigated by the appropriate plant personnel and discussed with this department prior to installation. ~~Mandatory~~ ~~personal~~ protective equipment in the form of approved air purifying respirators will provide temporary ~~OSHA compliance~~ under Section 1910.93a, (d), (1), (i) during the time period necessary to install the required engineering controls.

The employees stationed at the east and west ~~disc~~ ~~brake~~ loading stations on the Conforming Matrix washer were found to have ~~asbestos~~ exposures of 4.2 and 4.1 fibers per cubic centimeter of air. It is our understanding that

PLAINTIFF'S
EXHIBIT
CHR-173

Re: Semi-Annual Asbestos Survey

the slot grind line "defuzzers" will become operational in the near future. The "defuzzer" consists of a rapidly rotating cylindrical brush located in an exhaust ventilated enclosure. The "defuzzer" cleaning operation is intended to remove the loose asbestos fibers which adhere to the brake shoe after the slot grinding and flat finishing operations. The planned removal of these loose asbestos fibers should significantly reduce the magnitude of asbestos exposure at the Conforming Matrix washer and elsewhere when these parts must be inspected, loaded or assembled by hand. The Industrial Hygiene Department will have to [redacted] employee exposure levels during the period when the new equipment is being installed. Because [redacted] [redacted] over the [redacted] it, [redacted] air [redacted] [redacted] [redacted] personal equipment for the employees stationed at the washer during the time period necessary to install the required engineering controls.

Note that air samples (43) and (35) are in excess of the July 1, 1976 two fiber/cc OSHA permissible exposure limit. These air samples do not represent time weighted average (TWA) exposures because they were not collected over an eight hour period. For example, air sample (45) weigh-up, which is a time weighted average or TWA, is below the new OSHA limit, while air sample (44) weigh-up, which is not a TWA, is in excess of the two fiber standard. It is, therefore, evident that additional samples will be required at the Mill Creek Injection Operation and at the Mopac line packing operation in order to more fully determine the magnitude of employee exposure at these job locations.

Haphazard handling of asbestos waste and loose fiber bonded material appears to be a continuing problem at this facility. Vacuum cleaning of asbestos waste materials is required in order to prevent excessive airborne levels and vacuum cleaning equipment is evident throughout the plant, yet most employees appear reluctant to use this equipment. Employees were observed using brooms, gloves, rags and hands to clean up asbestos waste on several occasions during the course of this survey. It is the responsibility of the plant management to explain the rationale behind the use of the vacuum cleaning equipment and to enforce its usage in those areas where failure to do so will result in elevated airborne asbestos levels.

D.P. Morgan.

D. P. GLAZIER
Industrial Hygienist

Attachment

cc: C. D. Benson
J. A. Burnett
J. D. Cannon
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J. A. Lardie
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Data Sheet

TRENTON CHEMICAL

ASBESTOS

May 1976

Location

Concentration

(Fibers, greater than
five microns in length,
per cubic centimeter
of air)

Current OSHA Standard

5.0

July 1, 1976 OSHA Standard

2.0

Friction Products Building

(1)	Personal air sample, #1 Bipel operator	1.6
(2)	Personal air sample, #1 Bipel operator (time-weighted average concentration)	1.5
(3)	Personal air sample, #11 and #12 hot press operator	1.0
(4)	Personal air sample, #2 Bipel operator	1.8
(5)	Personal air sample, #3 Bipel operator (time-weighted average concentration)	3.9
(6)	Personal air sample, #4 Bipel operator including cleanup operations	2.0
(7)	Personal air sample, #15 and #16 hot press operator	1.0
(8)	General air sample, immediately adjacent to the #17 hot press	0.7
(9)	General air sample, immediately adjacent to the #3 Bipel press	0.2
(10)	Personal air sample, #5 Bipel operator including cleanup operations	3.1

<u>Location</u>	<u>Concentration</u>
(11) Personal air sample, #21 and #22 hot press operator	0.8
(12) Personal air sample, #6 Bipel operator	0.3
(13) Personal air sample, #7 Bipel operator and #26 hot press operator	0.7
(14) General air sample, immediately adjacent to the #26 hot press	0.7
(15) Personal air sample, #27 and #28 hot press operator	0.2
(16) Personal air sample, #8 Bipel operator	0.2
(17) General air sample, immediately adjacent to the #22 hot press	0.7
(18) Personal air sample, #17 and #29 hot press operator	0.7
(19) Personal air sample, #8 Bipel operator during cleanup operations only	1.1
(20) Personal air sample, loading and unloading disc brake shoes at the Myr oven aluminum gasket bonding operation	0.5
(21) Personal air sample, inspecting and packing disc brake shoes after Myr oven bonding, including cleanup operations	2.6
(22) Personal air sample, champ grinder operator #152774, Mopar line	0.4
(23) Personal air sample, champ grinder operator #152774, Mopar line, (time-weighted average concentration)	0.1

<u>Location</u>	<u>Concentration</u>
(24) Personal air sample, Mopar line, proof testing on machine #152775	1.4
(25) Personal air sample, packing drums brakes into cardboard boxes on the Mopar line	2.8
(26) Personal air sample, sealing replacement part boxes on the Mopar line	0.4
(27) Personal air sample, grinding drum brake shoes at the belt sander which is adjacent to the overhead ovens	0.7
(28) General air sample, directly adjacent to the #2 overhead oven at breathing zone level	0.5
(29) Personal air sample, loading the #1 overhead oven	0.2
(30) Personal air sample, #1 slot grinder inspector	< 0.1
(31) Personal air sample, #2 proof test and slot grind operator	1.7
(32) Personal air sample, #2 slot grinder inspector	0.8
(33) Personal air sample, #3 proof test and slot grind operator	1.3
(34) Personal air sample, #3 slot grind inspector	1.0
(35) General air sample, five feet northeast of the #3 proof test operation	< 0.1
(36) Personal air sample, #1 OEM grinder operator (time-weighted average concentration)	0.4

<u>Location</u>	<u>Concentration</u>
(37) Personal air sample, packing drum brakes on the #2 OEM line	0.7
(38) Personal air sample, #1 and #2 saw line operator	1.2
(39) Personal air sample, unloading drum brake linings after oven forming at the #1 and #2 saw lines	0.2
(40) Personal air sample, aluminum gasket application	0.5
(41) Personal air sample, loading disc brake shoes into the west side of the Conforming Matrix Washer	4.1
(42) Personal air sample, loading disc brake shoes into the east side of the Conforming Matrix Washer	4.2
(43) Personal air sample, weigh-up and #1 skip hoist loading	1.0
(44) Personal air sample, weigh-up and #2 skip hoist loading	2.3
(45) Personal air sample, weigh-up only (time-weighted average concentration)	1.2
(46) Personal air sample, loading the #1 skip hoist (time-weighted average concentration)	0.1
(47) Personal air sample, unloading the #4 lodge (time-weighted average concentration)	0.3
(48) Personal air sample, unloading the #4 lodge mixer	0.7

<u>Location</u>	<u>Concentration</u>
(49) Personal air sample, Tennant sweeper operator	0.1
(50) Personal air sample, janitor, cleaning rest rooms and skip hoist area	0.2
<u>Chemical Building</u>	
(51) Personal air sample, loading the Day blender with resin grade asbestos	0.6
(52) Personal air sample, loading the Day blender with Union Carbide 244 resin grade asbestos (20 bags)	0.4
(53) Personal air sample, loading the #1 Readco blender	0.5

All determinations of airborne asbestos fiber concentrations were made by the Industrial Hygiene Laboratory using the OSHA dictated membrane filter method at a magnification of 430x with phase contrast illumination.