

PLAINTIFF'S
EXHIBIT

CHR-148

CC: NATV 1/26/72 CLJ	File - OSHA SUBMITTED CHEMICAL PLT.	File Code	Date 7-25
Lang J. Gulish	Department	Division	Plant/Office
Lang J. Gulish	Department	Chemical	Trenton
Lang J. Gulish	Personnel Manager	Chemical	Trenton

Complaint Investigation - OSHA Department of Labor

On ~~July 18~~, 1972 at 10:00 a.m., Mrs. Coutts, in my office, was informed by the Receptionist, Mary Bates, that two men from the Occupational Safety and Health Administration were in the lobby. She asked the Receptionist to notify E. Lombard in the Division Safety office. Mr. Lombard went to the lobby and met Mr. Rudolph Zoller, who identified himself as a Compliance Officer of the Occupational Safety and Health Administration, U.S. Department of Labor, showing his identification card. He introduced his assistant as John Vukovich, who had no credentials. Mr. Zoller explained that we would have to accept his word on the fact that Mr. Vukovich was also a Compliance Officer, who had not received official identity papers as yet because he had been on the job only a few weeks.

Members. ~~John Vukovich~~ were brought to my office by Mr. Lombard where I was ~~present~~ (see attached) of a complaint which was sent to the OSHA Detroit Office ~~by~~ ~~at the~~ Trenton plant. The ~~complaint~~ that the Chrysler Corporation Friction Products ~~plant~~ was in violation of the emergency standard on asbestos ~~containing approximately 110 employees on certain designated equipment~~ ~~level of asbestos dust.~~

Mr. Zoller explained that he was an employee of the State of Michigan Health Department who had been assigned on a one-year contract to work for OSHA on certain target health hazards. Asbestos is one of these, therefore, when the complaint was received he was assigned to visit the plant to take air samples in the locations listed in the complaint. He asked for information on the address of the Chrysler Corporation and the number of employees, male and female, on each shift. He also requested that a Union representative be informed so that the representative would accompany him on his visit. A Union committeeman, W. McDade, was asked to meet the OSHA Compliance Officers at the Friction Products Building. Mr. Lombard and I escorted the OSHA Officers to the Friction Products Building where we met Mr. McDade and made a tour of the entire manufacturing area pointing out as requested by the Compliance Officers the equipment specified in the complaint.

Mr. Zoller explained to us that he was going to take air samples and velometer readings in the plant and would probably be at the plant until Friday. He then brought his equipment in and started to take some samples. Mr. Vukovich requested a list of the ingredients used in the manufacture of brake linings which was provided by J. Nordman.

Mr. Lombard had notified the Corporate Safety Office when the men arrived, and D. Escheliach was informed. In the afternoon, Mr. Sattelmeyer from Corporate Industrial Hygiene arrived at the plant. He or Mr. Lombard stayed with the OSHA men all the time they were in the plant on Tuesday, Wednesday, and Thursday. Mr. Sattelmeyer took several air samples with his equipment at the same time the OSHA samples were being obtained. The OSHA men observed the operation where an air hose was used to clean a hopper on the rolling machine but did not take any samples because the air hose was removed and the hopper is being cleaned with a vacuum cleaner.

The Union representative was not in attendance at all times while the air samples were being taken. The Union representative informed the Compliance Officers that asbestos was being used in the Chemical Products Plant. The OSHA men took samples at this location. During the time required to obtain a sample, Mr. McDade, the Union representative, took Mr. Yukovich on a personally conducted tour of the Chemical Plant operations pointing out what the Union thought were hazards and lack of adequate exhaust ventilation in the paint centers, at the Baker Perkins, and Dry Blender. Mr. McDade also reported that a man was required to climb over a railing and walk on the top of a tank without any protection from falling should he slip when measuring the contents of a tank. Mr. Lombard informed the Officers of a project which had been prepared to bring all catwalks in compliance with OSHA regulations. He explained that, in the interim, the measuring of the tank had been discontinued and no employee was required to climb over a railing and walk on top of a tank. The Union had been informed of this in reply to a grievance submitted several months ago. Mr. Lombard also told the OSHA men of the continuing effort to improve exhaust ventilation on the Baker Perkins mixers and the work that had been done.

The OSHA Officers, upon completion of their testing on Thursday morning, July 20, asked to see the Plant Log of Occupational Injuries and Illnesses and Supplementary Records. Mr. Zoller reviewed our records and asked if the Chrysler Corporation Medico Legal Form contained all the information required in the OSHA No. 101 Form. When the revised Form 11/71 was reviewed with him, he had no further questions and said that our records were satisfactory.

Velometer readings were made in the Friction Products operations on Thursday afternoon, July 20, which completed their work.

At 3:00 p.m., Mr. Zoller and Mr. Yukovich met with S. Enders, J. Cannon, F. Repucci, E. Lombard and G. Sattelmeyer in a closing conference. Mr. Zoller stated that in general he thought the

The OSHA Compliance Officers left the plant at approximately 3:15 p.m. on Thursday, July 20.

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T. J. Lane
Personnel Manager

25/4 -

1. DeWinger
 2. Powers
 3. Cannon
 4. Eschelbach
 5. Lombard
 6. McCallum
 7. Repucci

Attachment

U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

OMB No. 1213-0045

For Official Use Only		
Area	Date Received	Time
Region	Received By	

COMPLAINT

This form is provided for the assistance of any complainant and is not intended to constitute the exclusive means by which a complaint may be registered with the U.S. Department of Labor.

Assigned (check one)

Employee ☒ Representative of employees ☐ Other (specify) _____

I state that a violation of the following place of employment of an occupational safety or health standard exists which is a job safety or health hazard.

Is hazard(s) immediately threaten death or serious physical harm? ☐ Yes ☒ No

Employer's Name CHRYSLER CORPORATION CHEMICAL DIVISION

(Street) 5437 W. Jefferson Avenue Telephone OR 6-3200

(City) Trenton State Michigan Zip Code 48103

Kind of business Brake lining and disc brake manufacturing (a division)

Specify the particular building or worksite where the alleged violation is located, including address.

Friction Products Plant, 5437 W. Jefferson Avenue, Trenton, Michigan 48103

Specify the name and phone number of employer's agent(s) in charge.

Elmer Lombard OR 6-3200 ext. 552

Describe briefly the hazard which exists there including the approximate number of employees exposed to or threatened by such hazard.

Employees being exposed to high levels of Asbestos dust exceeding the emergency standard.

In the plant we now have mixing machines that are blowing Asbestos dust. Conveyors that convey asbestos breaking down and filling the plant with dust. The main areas that I

feel employees are being exposed to high levels of exposure to Asbestos are the O.E.M.

Mixers, the Extruder Room, the O.E.M. Grinders, O.E.M. Inspection tables, the Ripels

and the Disc Brakes Inspection Operations. Management in the plant are allowing the use

mechanical power sweepers and push brooms to sweep up Asbestos dust. Only one operation

employees are using air hoses to blow asbestos dust, which in both cases is a violation

of the emergency standard. Approximately 110 employees are (Continue on reverse side if necessary)

Sec. 3001 of the Williams-Steiger Occupational Safety and Health Act, 29 U.S.C. 651, provides as follows: Any employee or representative of employees who believe that a violation of a safety or health standard exists that threatens physical harm, or that an imminent danger exists, may request an inspection by giving notice to the Secretary or his authorized representative of such violation or danger. Any such notice shall be reduced to writing, shall set forth with reasonable particularity the grounds for the notice, and shall be signed by the employees or representative of employees, and a copy shall be provided the employer or his agent no later than at the time of inspection, except that, upon request of the person giving such notice, his name and the names of individual employees referred to therein shall not appear in such copy or in any record published, released, or made available pursuant to subsection (g) of this section. If upon receipt of such notice the Secretary determines there are reasonable grounds to believe that such violation or danger exists, he shall make an inspection in accordance with the provisions of this section as soon as practicable, to determine if such violation or danger exists. If the Secretary determines there are no reasonable grounds to believe that a violation or danger exists, he shall so advise employees or representative of the employees in writing of such determination.

Has this violation been considered previously by any Government agency?

If so, please state the name of the agency.

If so, please state the approximate date it was considered.

Has this complaint, or a complaint alleging a similar violation, been filed with any other Government agency?

If so, please give the name and address of each.

Has your knowledge of this violation been the subject of any union/management grievance or have you (or anyone you know) otherwise called it to the attention of, or discussed it with, the employer or any representative thereof?

If so, please give the results thereof, including any efforts by management to correct the violation.

Now indicate your desire:

☒ I do not want my name revealed to the employer.

☐ My name may be revealed to the employer.

Indicate here, if additional space is needed.

Have you been exposed to a violation of the emergency standard on a daily basis?

Signature _____ Date _____

Printed Name _____

Are you representative of employees,
the name of your organization _____

Address _____

Telephone _____

State _____

Zip Code _____