FILE NAME: BF Goodrich (BFG)

DATE: 1979 Sept 7

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C. M. Fischer

M. D. Schrader 9-7-79

ASBESTOS

A compliance officer of the Division of Occupational Safety and Health, Kentucky Department of Labor, visited the plant on Tuesday, August 28, 1979. The officer stated that she was here to investigate a complaint submitted by unnamed representatives of BFG employees. I am enclosing a copy of the complaint as submitted. It states: "Insulators are exposed to asbestos fibers during demolition without proper protection. No monitoring has or is being done. Medical exams are not given. Approximately seven (7) insulators plus some pipefitters are affected."

The investigating officer interviewed supervisors R. Beard, R. Armstrong and M. Chelf. She also spoke with union representatives R. Hickman (Local 72) and W. McIntyre (Local 522). Hickman informed the officer that demolition of pipes covered with asbestos was in progress south of Buildings 5 and 15. The officer, Hickman, Chelf and I went to that area.

The officer interviewed pipefitter W. Casteel and insulators D. Snipp and R. Pitts. These interviews were conducted in private; therefore, it was not possible for me to know what information these people conveyed to the inspector.

I observed pipefitters removing pipe, some of which was covered with what appeared to be asbestos. The fitters were not wearing masks; the area was not roped off with asbestos caution signs; there did not appear to be any containers available for disposing of the asbestos, nor were any of the fitters wearing protective clothing. It has become very evident the compliance officer made the same observations. Consequently, a citation was received on September 5 naming each of these violations. I am also enclosing a copy of the citation. Please note the date that we agreed to have the violations abated, September 18, 1979.

In the meantime until we are certain that we are in complete compliance with OSHA Standard 1910.1001 - Asbestos, I recommend that no further demolition or removal of pipes, structures or equipment covered or insulated with asbestos be iniated without specific permission from the Safety Department. This permission can only be given after a thorough inspection of the area and employees involved gives assurance that we are in complete compliance for this specific job. I am also enclosing a copy of the asbestos standard and the Louisville Plant S.O.P. No. 76-14, "Removal of Insulation Containing Asbestos."

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I will be glad to meet with you to discuss in complete detail the inspection, the asbestos standard, and our future plans for handling of this citation.

M. D. Schrader

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Enclosures

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