PERSONAL & CONFIDENTIAL

CERTAIN-TEED PRODUCTS CORPORATION

CERTAINTEED

TO (LOCATION)	FROM (LOCATION)
Valley Forge P&PG	St. Louis Pipe Plant #59
ATTENTION OF: A. E. Alpine	DATE: January 16, 1973
ANSWERING YOURS:	DICTATED BY: S. G. Leyshock - jb
SUBJECT: O.S.H.A. Inspection	

PLAINTIFF'S EXHIBIT

CT-508

The following is an account of the six day O.S.H.A. Inspection that was brought about by a complaint registered by Local 36.

The O.S.H.A. inspectors were 1) Denver L. Holt, 2) William H. Spain, 3) Danny R. Sheppard.

12-14-72 (Thursday)

O.S.H.A. Industrial Hygienist (2) arrived at main gate at 1:00 P.M. Met at gate by William Fischer, who checked credentials and escorted them into the area. First stop was Lloyd Campbell's office for general information session and review of complainant on record.

The initial plant familiarization tour was conducted by the writer and accompanied by Paul Denen as the Union representative, along with both O.S.H.A. personnel - Mr. Holt and Mr. Spain. After tour we were advised they would return the following morning.

12-15-72 (Friday) 8:00 A.M.

They began air sampling of Department 901-Manufacturing key exposure areas for silica and fiber content of both #1 and #2 Pipe Machines. The positions monitored were 1) Fibermen, 2) Machine Tenders, 3) Relief Men.

Paul Denen intercepted the O.S.H.A. people early in the morning and suggested the following items be investigated:

1. He requested them to check the noise level at the crusher on large diameter pipe - either 16" 150 or 14" 200, etc. The people in 902 are complaining about the noise level and exposure to said noise.

2. Paul also commented that Foremen and Management quickly put out the word and gathered all straw brooms used for sweeping normally in the plant.

CTD017638

12-18-72 (Monday)

Finished the sampling of Manufacturing #1 Pipe Machine where monitoring halted Friday because of machine shutdown. Began sampling in Finishing Department 902 on the #2 Lathe and old F.M. Lathe. Noise level soundings were taken on the #2 Lathe. Its peak range was 97DBA and suggested no particular problem. (Mr. Sheppard, Safety Officer, was brought in to assist in sampling).

9 6/67

12-19-72 (Tuesday)

Began air sampling of the crusher area, rework saw, coupling saw, boring mills, core drills area. CO and CO_2 samplings of heavily traveled truck aisles were conducted by Mr. Holt, who stated the readings were recorded as one-half the allowable limits. They started taking photos of all areas as descriptive information for the report filing on completion of the inspection.

At various times they questioned the dust problems and full hopper situations and lack of personnel assigned on the floor sweepers and vacuum cleaners which were noticed as idle the majority of the inspection to date. They were assured this was highly unusual and the heavy vacation schedule by plant employees at Christmas contributed to this condition in 1972 and is to be corrected for the following year. They seemed to accept this statement and few questions were asked following this discussion.

12-20-72 (Wednesday)

Started to sample #3 Lathe line personnel - Operator, Helper and Inspector. Took photos of areas noting dust collection system which denotes our concern to control the elements.

Went to Plant #3 for sampling of the unloading of trailer trucks containing Government Blue Fiber at the ramp dock to the building. I explained this was a one time situation for usage of this fiber and this was recorded in the notes covering the air sampling. As we know, it yields a very dirty condition, whereby the millipore filters were covered in less than (14) minutes of checking - noting a high exposure condition. Crew was adequately protected by respirators.

PLANT #3

Paul Denen was present during the sampling of trailers and later Paul and Buday voiced complaints to O.S.H.A. regarding dust problems at the table saw for Fittings (elbow blanks). Paul also reintroduced the question of sampling of the fluffer operation on the #2 Pipe Machine, if it had been checked as requested by earlier complaints of station personnel during coverage of 901. Mr. Spain replied, "No, normal scheduling of production did not require the CCC Fiber which requires the fluffer activity; therefore, they hadn't sampled, but would conduct other tests".

12-21-72 (Thursday)

Completed air sampling of Fittings table saw - 905. I stated the saw was used a maximum of six hours per week which they entered in the notes. (Probable Dust Problem)

Completed noise survey on #3 Lathe which indicated possible problem area in which the employees were exposed to 105DBA for approximately .28 minutes of each minute of operation or 17 seconds total.

Conducted a Smoke Test on #2 Pipe Machine Fiber Station Drop which proved adequate ventilation of dust and vapors. Used a Velometer to check air flow which also proved adequate in range of 400-465 FPM and with fluffer in operation measured 385 FPM with a minimal drop in FPM. (Sampled by Mr. Spain)

Mr. Sheppard (O.S.H.A. Safety) mentioned a few safety items (gigs) that should be noted in 901 and he wanted to approach both Management and the Union together regarding potential problems of exposed chains on the Pipe Machines. I stated I would arrange for P. Denen to make a tour with Management for discussion of items. These were submitted as follows:

1. No guards on mandrel conveyor chains at #2 Pipe Machine press section where employee could become involved while working.

2. No guards on chain drop mechanism to tunnel on #1 Pipe Machine (Same as above).

   NOTE: These guards have already been installed.

3. Trucks had no reverse mechanism installed (clangers on wheels). This item was later retracted before actual tour due to an optional condition in standards.

GENERAL REVIEW

Record keeping was considered in good order and in accordance with all requirements. Physical examination program appears to be on schedule and following general rules adopted.

In the final conference held Tuesday, December 26, we were complimented on the courtesy and cooperation shown the inspectors on their visit. They felt that we were, in fact, making much more than a token attempt to abate dust.

The following items were reviewed, but everything was supposition until the reports of the samples taken are reviewed. We could receive citations for these items as charged by the Union's complaint.

1910:93A Page 22143 Col. 2 Sect. f

All jobs in plant should have been monitored and we only had spot checks. (Possible citation)

NOTE: It was suggested we order our own monitoring equipment immediately. Must comply within 90 days.

1910:93A Page 22142 Col. (2) Sub. 3

Ceiling concentration (depending on outcome of sampling). If a high level, we must have a compliance plan. Par. C under 3 Page 22142
Ref ANSI Z9.2-1971.

The arrangement for feeding fiber into fiber elevators to be changed within 90 days.

Please remember that all of this only holds true if the samples show high concentration, which I do not feel will happen.

Finishing

1. They are not satisfied with our dust hoods on lathes and will give us six months to improve.

2. Dust collector waste (hoppers and method of unloading).

3. Noise level on Bertram lathe Page 22157-158

   (a) Sign and ear protection equipment immediately.

   (b) Attempt to engineer out sound.

   (c) Administrative control.

I feel Item 3 above will be a citation. We have already complied with Item 3. (a) Sign and ear protection.