

FILE NAME: Borg Warner (BW)

DATE: WtΩ

DOC#: BW

DOCUMENT DESCRIPTION: ξΩμŃσ'1ξŚ w\$μűú ũΩ h{ I ! LΩσμ\$ŃűűΩ

O.S.H.A. Closing Conference
Spring Division
Bellwood, Ill.

January 12, 1978

A Closing Conference Meeting held on 1-12-78 from 10:15 a.m. to 1:00 p.m. on OSHA
Inspection of Spring Division, Borg-Warner Corp. conducted on September 13, 1977.

Present: William Stiens - Manager Loss Control, Borg-Warner Corp.
Thomas Chambers - Plant Engineer - Spring Division
James Geis - Vice President and Factory Manager - Spring Division
Joseph Fabiani - Director Industrial Relations - Spring Division
Gilbert Krotz - Manager - Safety and Security - Spring Division
Nancy Quick - Industrial Hygienist, U.S. Dept. of Labor, O.S.H.A.
Isabelle Fox - Secretary to J. E. Geis, V.P. & Factory Mgr. - Spring Div.

Nancy Quick, Industrial Hygienist, U. S. Dept. of Labor, O.S.H.A. conducted the
meeting. Tom Chambers asked what we would be discussing first. Nancy Quick
answered that it would be NOISE and that we would go over all apparent violations,
and if anyone had any questions when finished to please feel free to ask.

NOISE: Violation 1. Nancy Quick stated that it was her observation that some
people were not wearing hearing devices where there is excessive noise and where
hearing protection signs were posted. She asked if it is company policy to enforce
hearing protection.

Jim Geis stated: "Yes, they are required to wear hearing protection devices
where signs are posted and we will enforce their use."

Mrs. Quick indicated the following readings were recorded.

<u>Press #</u>	<u>Dept. #</u>	<u>Area #</u>	<u>dbA</u>
8	42	2	97
16	42	5-1	96
-	36	3	94
42	34	3	96
2	42	-	96
232	37	10	101
-	53	9	94
1400	54	13-1	100
1414	54	13-1	96
-	37	13-1	96
177	31	10	104
272	40	51	94

Nancy Quick asked for abatement periods to be established.

Step 1 Engineering Survey - 6 Months

Step 2 Plan - 3 Months

Step 3 Final Abatement Complete Compliance - 2 yrs. or possibly 3 years.

Nancy Quick asked if Spring Division wished to contest and Bill Stiens answered that if there is no feasible way of complying it is our policy to contest.

Nancy Quick asked what we were doing to comply.

Bill Stiens stated that we have utilized outside engineering services to reduce noise and that many things have been done.

Jim Geis made a statement on how much money we have spent on OSHA not just to try to keep in compliance but on our own to improve safety and health standards for the benefit and protection of our employees.

ASBESTOS: Violation 1. Sec. 1910.1001. Employees working in the compactor room exposed to 14f/cc - 15 min.

Employee's name was asked, by group, and Nancy Quick stated that if it were possible to divulge she will notify Jim Geis.

Nancy Quick stated that they were using an air hose for cleaning, and asked if we have any written rule to that effect, and do we have any other method of cleaning. They would have to check on the written rule.

Mr. Stiens contended that we do have a working vacuum cleaning device designed for this work and that the employee violated the rule when he used the air hose for cleaning.

Nancy Quick asked why there is an air hose in the area and Mr. Krotz answered that this was at one time a shipping dock and at that time they had dock levelers and equipment which required air pressure to operate.

Tom Chambers asked if there is a law that you must use a vacuum cleaner as opposed to an air hose. Nancy Quick said that OSHA does have regulations and you have to devise work practices so that you are not in violation.

Nancy Quick asked "What are you going to do to abate?"

Tom Chambers stated that we have provided total enclosure from exit to receiving.

side of the compactor.

Jim Geis stated that we will get rid of the air hose.

Bill Stiens stated that we will assure that there are: Step 1. Written work rules. Step 2. A Vacuum cleaner only will be used to clean up. Step 3. Air hose will be removed.

Nancy Quick: "Would 2 weeks time be sufficient to have provided total enclosure?"

Tom Chambers stated that it was completed on October 17.

Nancy Quick: "Are you going to keep on using the present respirator?"

It was undecided as to what type of respirator should be used. Nancy Quick will get back with Bill Stiens on what type of respirator is to be supplied.

Nancy Quick: "Do you have any type of respiratory program?"

Gil Krotz answered that the employee was shown how to use it properly. Nancy Quick asked where they are stored. Joe Fabiani stated that they are easily accessible.

Nancy Quick stated that Sec. 1910.134 has everything listed that you will need to be in compliance.

Nancy Quick: "Do you supply uniforms for compactor operator?"

Joe Fabiani stated that we supply all of our employees uniforms but it is not compulsory to wear them.

Nancy Quick asked if we notified the Union Linen Company of the asbestos exposure.

Bill Stiens stated that we will follow up notifying Union Linen of the asbestos exposure.

Tom Chambers asked a question regarding the submission of reports. Nancy Quick stated that a report must be submitted when a violation is corrected and that must be done before the end of the abatement period, and it is good practice to submit progress reports on violations with a long abatement period at approximately 30 day intervals.

Asbestos - Violation 2. 1910.1001(d)(4)(iii)(b) Failure to notify Union Linen Company that coveralls may contain asbestos fibers.

W. Stiens: "We will follow up and notify Union Linen Company."

Violation 3. 1910.1001(d)(4)(iii)(c) Contaminated clothing transported in open bins. Abatement - 30 days.

Nancy Quick asked about Monitoring. Personal monitoring should be done every six months.

Violation #4. Monitoring Compactor Room on 6 month intervals. Abatement - 2 months

Nancy Quick asked many questions about our concern over readings on fiber limit and what we thought about it and were going to do about it, and why didn't we, etc.

Bill Stiens: "We had many readings prior to that which were not above the 10 fiber limit. The Industrial Hygienist from Nalsco indicated only one high reading and we considered this to be an unusual reading."

Nancy Quick asked "Do you give employees an opportunity to see monitoring?"

It was agreed that if the employee wished to see it, it would be made available.

Caution Signs and Labels:

Nancy Quick stated that we must have caution signs in compactor room.

Violation #5. Failure to provide caution sign indicating asbestos exposure in compactor room and failure to label laundry with caution label.

Abatement: 2 weeks.

Caution signs will be posted and laundry will be labeled with caution label.

Nancy Quick: Places of employment were not maintained free of accumulation of asbestos fiber outside of compactor room east wall and saturation machines #5 and #2 upstairs.

Violation #6. Visible asbestos accumulations.

It will be cleaned up.

Violation #7. Failure to notify employee of exposure to asbestos fibers within 5 days, in excess of allowable standards = 19 fibers per cc. 5-11-76.

Bill Stiens stated that the reason the employee was not notified was because all but one reading indicated that we were in compliance and we felt that the employee was not over-exposed.

Medical Examinations

Violation #8. Failure to provide medical examinations for employees in compactor room, Dept. 53 area 9; band liner blanking, sand and groove Dept. 40, area 5-1; final cure, Dept. 47, area 4-1; final inspection packing, paper blanking, Dept. 32.

Bill Stiens stated that the Assistant O.S.H.A. Regional Administrator, M. Brickman, stated in a telephone conversation Jan. 10, 1978 that physical examinations are required only if a fiber concentration exceeds a 0.1 fiber for an 8 hour TWA or a 0.5 fiber ceiling.

Bill Stiens stated that for the record, on the past advice from OSHA and N.I.O.S.H. we did not order physicals based upon the readings at that time in our possession. (Mr. D. Jenetka, Industrial Hygienist, OSHA Chicago, January 15, 1973, 1 fiber/cc).

Nancy Quick: "Are you going to provide medical examinations?"

Bill Stiens: "Yes, for the compactor room employees."

Abatement Period: 1 month for physicals and notification of being in excess.

Clean up of asbestos fibers - 2 weeks.

Flammable and Combustible Liquids:

Nancy Quick stated that on Saturation Line #1 they were mopping the floor with MEK and pouring MEK from metal bucket on floor and using it for a cleaning liquid.

Violation #1. Misuse of flammable liquid in Saturating Room.

Action will be taken to insure that employees do not misuse flammable liquids.

Emergency Respirators

Violation #1. Air line respirator used by maintenance to service degreasers violated Sec. 1910.134(d)(2)(ii).

Not provided with CO or high temperature alarms and filters.

Violation #2. Employees not trained in the use of respirators.

Violation #3. Respirator equipment not inspected monthly and inspection results recorded.

Protective clothing to be worn in the degreaser room was discussed and some other items that were covered were rediscussed.

Nancy Quick exhibited a small brochure from OSHA which she read each citation category requirements and our legal rights to contest, etc. and stated that we would be receiving a copy of this brochure (with our notice of citation) which should clarify any further questions we might encounter. She concluded the meeting at 1:00 p.m. and stated that we may contact her if we have further questions before the citation is issued.

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

CITATION and NOTIFICATION OF PENALTY

Miles Area Office
6000 West Touhy Ave.
Miles, Illinois 60648
(312) 631-8200

TYPE OF VIOLATION(S)	CITATION NO
Serious	1

ISSUANCE DATE	OSHA NUMBER
2/14/78	Q6677 043
REGION	AREA PAGE
5	8030 3 of 5

INSPECTION DATE:
9/8/77 - 1/12/78

INSPECTION SITE:
Same

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

PENALTIES ARE DUE WITHIN 15 DAYS OF RECEIPT OF THIS NOTIFICATION UNLESS CONTESTED (See enclosed Booklet)

This Section to Be Detached Before Posting

TO:
Spring/Brunner Div. of Borg-Warner
700 S. 25th Ave.
Maywood, IL 60104

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER	STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED: DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
	totalling between at least two hours and seven hours during the work-day.		
	(1) In the area of sanding machine #272 located in department 40, a sound level existed between approximately 92 dBA and 97 dBA with a weighted mean dBA of approximately 94 dBA as measured on the A scale of a standard sound level meter. <u>At least one employee was exposed to said noise levels for periods of time totalling between five hours and six and one-half hours during the workday.</u>		
Step 1	A written detailed plan of abatement leading to the complete abatement of this item shall be submitted to the Area Director. Such a plan shall: a) employ the use of <u>qualified engineering personnel</u> ; b) include detailed engineering studies and their results; c) outline the ordering of equipment and materials and completion of the design phase; and d) outline dates for the anticipated implementation of the plan.	7/10/78	
Step 2	Feasible engineering controls and/or administrative controls shall be determined.	9/10/78	
Step 3	Abatement shall be completed by implementation of feasible engineering and/or administrative controls and its effectiveness at achieving compliance verified. 90-day progress letters are requested during the abatement period.	2/10/79	
2	29 CFR 1910.106(e)(6)(i): Adequate precautions against the ignition of flammable vapors were not taken:	2/20/78	800
	(a) In the room containing saturation line #1, the metal floor was mopped with a removable mop head clamped to the mop handle by means of a steel clamp, which was used to spread methyl ethyl ketone.		
	(b) In the room containing saturation line #1, methyl ethyl ketone was poured from a metal bucket onto a metal floor.		
3	29 CFR 1910.1001(b)(3): Employee(s) were exposed to airborne concentrations of asbestos fibers in excess of the ceiling concentration	3/10/78	800

AREA DIRECTOR

Frank C. Memmott

F. C. Memmott

NOTICE TO EMPLOYEES - The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION - The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

CITATION AND NOTIFICATION OF PENALTY
DUPLICATE

OSHA-2 REV. 5/76

On last p
TOTAL PENALTY
FOR THIS
CITATION
Make check or M.O.
Order Payable
"DOL OSHA"
Indicate OSHA
on Remittance

Mead 003786

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

CITATION and NOTIFICATION OF PENALTY

Miles Area Office
6000 West Touhy Ave.
Miles, Illinois 60648
(312) 631-8200

ISSUANCE DATE 2/14/78	OSHA NUMBER Q6677 045
REGION 5	AREA 8030
PAGE 4 of 5	

389

TYPE OF VIOLATION(S) - CITATION NO.
Serious 1

INSPECTION DATE:
9/8/77 - 1/12/78
INSPECTION SITE:
Same

PENALTIES
ARE DUE
WITHIN 15
DAYS OF
RECEIPT
OF THIS
NOTIFICAT
UNLESS
CONTESTE
(See enclosed
Booklet)

TO:
Spring/Brummer Div. of Borg-Warner
700 S. 25th Ave.
Maywood, IL 60104

THE LAW REQUIRES that a copy of this
Citation be posted immediately in a promi-
nent place at or near the location of the vi-
olation(s) cited below. The Citation must
remain posted until the violations cited be-
low have been corrected, or for 3 working
days (excluding weekends and Federal holi-
days) whichever is longer.

This Section
Be Detached
Before Postin

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED; DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
of 10 fibers longer than 5 micrometers, per cubic centimeter of air: Employees working in the compactor room were exposed to airborne concentrations of asbestos fibers of 14 fibers, longer than 5 micrometers, per cubic centimeter of air.		
4A 29 CFR 1910.13(d)(2)(ii): Oil lubricated compressor(s) were used to supply breathing air and did not have a high-temperature or carbon monoxide alarm(s) or both: The oil lubricated compressors used for supplying air to employees working in and around degreasers for the purpose of maintenance and/or repair.	3/10/78	500
4B 29 CFR 1910.134(e)(5): Both supervisor(s) and worker(s) were not instructed in the proper selection, use and maintenance of respirators by a competent person(s): The employees who use respirators while working in and/or around degreasers for the purpose of maintenance and repair.	3/10/78	
4C 29 CFR 1910.134(e)(5)(ii): Every respirator wearer did not receive fitting instructions including demonstrations and practice in how the respirator should be worn, how to adjust it, and how to determine if it fits properly: The employees who use respirators while working in and/or around degreasers for the purpose of maintenance and repair.	3/10/78	
4D 29 CFR 1910.134(e)(3): Written procedures were not prepared covering safe use of respirators in dangerous atmospheres that might have been encountered in normal operations or in emergencies: The respirators used by employees working in and/or around degreasers for the purpose of maintenance and repair.	3/10/78	
4E 29 CFR 1910.134(f)(2)(i): All respirators were not inspected routinely before and after each use:	3/10/78	

AREA DIRECTOR
Frank C. Mammett

F. C. Mammett

On last p.

NOTICE TO EMPLOYEES - The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION - The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

TOTAL PENALTY
FOR THIS
CITATION
Make check or M-
Order Payable
"DOL OSHA"
Indicate OSHA
on Remittance

CITATION AND NOTIFICATION OF PENALTY
DUPLICATE

OSHA-2 REV. 5/76

Mead 003787

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

CITATION and NOTIFICATION OF PENALTY

Niles Area Office
6000 West Touhy Ave.
Niles, Illinois 60648
(312) 631-8200

TYPE OF VIOLATION(S)	CITATION NO.
Serious	1

TO:

Spring/Brummer Div. of Borg-Warner
700 S. 25th Ave.
Maywood, IL 60104

1 ISSUANCE DATE	2 OSHA NUMBER	
2/14/78	Q6677	043
3 REGION	4 AREA	5 PAGE
5	8030	5 OF 5

INSPECTION DATE:
9/8/77 - 1/12/78

INSPECTION SITE:
Same

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER	STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED: DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
	Respirators used by employees working in and/or around degreasers for the purpose of maintenance and repair.		

AREA DIRECTOR

Frank C. Mennott

F. C. Mennott

NOTICE TO EMPLOYEES - The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION - The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

EMPLOYER DISCRIMINATION UNLAWFUL - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

2800.0

TOTAL PENALTY FOR THIS CITATION

Make check or Money Order Payable to "DOL-OSH". Indicate OSHA on Remittance

CITATION and NOTIFICATION OF PENALTY

DUPLICATE

OSHA-2 REV. 5/76

Mead 003788

390

PENALTIES ARE DUE WITHIN 15 DAYS OF RECEIPT OF THIS NOTIFICATION UNLESS CONTESTED (See enclosed Booklet)

This Section I Be Detached Before Posting

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

CITATION and NOTIFICATION OF PENALTY

Miles Area Office
6000 West Touhy Ave.
Miles, Illinois 60648
(312) 631-8200

TYPE OF VIOLATION(S)	CITATION NO
Other	2

1	ISSUANCE DATE	2	OSHA NUMBER		
	2/14/78		Q6677 045		
3	REGION	4	AREA	5	PAGE
	5		8030		1 OF 2

INSPECTION DATE:
9/8/77 - 1/12/78

INSPECTION SITE:
Same

TO:

Spring/Brummer Div. of Borg-Warner
700 S. 25th Ave.
Maywood, IL 60104

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

PENALTIES ARE DUE WITHIN 15 DAYS OF RECEIPT OF THIS NOTIFICATION UNLESS CONTESTED (See enclosed Booklet)

This Section A Be Detached Before Posting

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER	STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED: DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
1	29 CFR 1910.1001(d)(4)(iii)(b): The employer, who gave asbestos-contaminated clothing to another person for laundering, did not inform such person of the requirements in (a) of this subdivision to effectively prevent the release of airborne asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section: The employer did not inform the laundry (Union Linen) given asbestos-contaminated clothing that the clothing was contaminated with asbestos.	3/10/78	0
2	29 CFR 1910.1001(d)(4)(iii)(c): Contaminated clothing was not transported in sealed impermeable bags or containers labeled in accordance with paragraph (g) of this section: Asbestos-contaminated clothing given to a laundry (Union Linen) was transported in open bins, and the bins were not labeled in accordance with paragraph (g) of this section.	3/10/78	0
3	29 CFR 1910.1001(f)(2)(ii): The airborne asbestos monitoring schedule was not of sufficient frequency and pattern as to represent with reasonable accuracy the levels of employee exposure to airborne asbestos fibers: Airborne asbestos monitoring in the compactor room was done at intervals greater than six months.	4/10/78	100
4	29 CFR 1910.1001(g)(1)(i): Caution signs were not provided and displayed at all locations where airborne levels of asbestos fibers may be in excess of prescribed limits: Caution signs were not posted in the area of the compactor room.	2/28/78	0
5	29 CFR 1910.1001(h)(1): Places of employment were not maintained free of accumulations of asbestos fibers which, if dispersed, could result in an excessive concentration: The following places of employment were not maintained free of ac-	2/28/78	0

AREA DIRECTOR

Frank C. Mammott

F. C. Mammott

On last page

NOTICE TO EMPLOYEES - The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION - The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

EMPLOYER DISCRIMINATION UNLAWFUL - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

TOTAL PENALTY FOR THIS CITATION
Make check or Money Order Payable to "DOL OSHA" Indicate OSHA on Remittance

CITATION and NOTIFICATION OF PENALTY
DUPLICATE

OSHA-2 REV. 5/76

Mead 003789

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

CITATION and NOTIFICATION OF PENALTY

Niles Area Office
6000 West Touhy Ave.
Niles, Illinois 60648
(312) 631-8200

TYPE OF VIOLATION(S)	CITATION NO.
Other	2

1 ISSUANCE DATE	2 OSHA NUMBER	
2/14/78	Q6677 045	
3 REGION	4 AREA	5 PAGE
5	8030	2 OF 2

INSPECTION DATE:
9/8/77 - 1/12/78

INSPECTION SITE:
Same

TO:

Spring/Summer Div. of Borg-Warner
700 S. 25th Ave.
Maywood, IL 60104

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

PENALTIES ARE DUE WITHIN 15 DAYS OF RECEIPT OF THIS NOTIFICATION UNLESS CONTESTE (See enclosed Booklet)

This Section Be Detached Before Post

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER	STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED; DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
6	accumulations of asbestos fibers: 1) compactor room; 2) along the northeast wall outside of the compactor room; 3) saturation machine #5; 4) saturation machine #2. 29 CFR 1910.1001(i)(3): Employee(s) found to have been exposed at any time to airborne concentrations of asbestos fibers in excess of the prescribed limits were not notified in writing of the exposure or advised of corrective actions being taken: An employee exposed to an airborne concentration of asbestos fibers of 19 fibers, longer than 5 micrometers, per cubic centimeter of air, for 15 minutes was not informed of his exposure.	2/28/78	0
7A	29 CFR 1910.1001(j)(2): The employer did not provide or make available, to each employee, within 30 days following his first employment in an occupation exposed to airborne levels of asbestos fibers, a comprehensive medical examination:	3/10/78	100
8B	29 CFR 1910.1001(j)(3): The employer did not provide or make available, to each employee engaged in occupations exposed to airborne levels of asbestos, a comprehensive annual medical examination: The employer did not provide or make available a comprehensive medical examination to the following list of employees exposed to airborne levels of asbestos fibers: 1) those employees working in and/or around the compactor of waste; 2) those employees working in and/or around department 53, area 9; 3) those employees working in and/or around the sand and groove department, department 40, area 5-1, 4) those employees working in and/or around final cure, department 47, area 4-1; 5) those employees working in and/or around final inspection and packing; 6) those employees working in and/or around the paper blanking department, department #42, area 1-1. The comprehensive medical examination shall include, as a minimum, a chest roentgenogram (posterior-anterior 14 X 17 inches), a history to elicit symptomatology of respiratory disease, and pulmonary function tests to include forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV 1.0)	3/10/78 <i>Note attached readings, note "better" rather than "Service"</i>	

* AREA DIRECTOR

Frank C. Memmott

F. C. Memmott

200.0

NOTICE TO EMPLOYEES - The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION - The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

CITATION AND NOTIFICATION OF PENALTY

DUPLICATE

OSHA-2 REV. 5/76

Mead 003790

Borg-Warner Corporation

100 South Wacker Drive
Chicago, Illinois 60606



241

Inter - Office Memo

Subject: OSHA Hygiene Survey

Date: February 6, 1978

From: W. L. Stiens

To: Jim Geis

Attached are the results of the OSHA Industrial Hygiene Survey performed by OSHA Compliance Officer, Nancy M. Quick. Please note the following items.

Asbestos

Page 3.

You will note that we were over the 10 fiber per cc limit for a 15-minute ceiling value. During the cleaning of the compactor room, Ms. Quick indicated 14 fibers per cc.

The compactor/forklift truck operator showed two readings of 0.52 and 0.17 fiber per cc for an 8-hour time-weighted average. These readings are within the two fibers per cc limit, however they exceed the .1 fiber action level to begin physical examinations. Therefore, we will probably be cited for failing to perform the physicals.

All of the other readings were within the OSHA limits, however, I am concerned about the tetrachloroethylene exposure. On page 1238 of the BNA Current Report you will note that tetrachloroethylene has been identified by NIOSH as a carcinogen and they recommend that the TLV be limited to 50 ppm. Although you are within the 50 ppm standard, when word gets out that tetrachloroethylene is a human carcinogen it may cause adverse action, especially with female employees. It might be wise at this time to consider the use of less toxic materials such as 1,1,1-trichloroethane (methyl chloroform). Gil has copies of the BNA report.

W. L. Stiens

WLS/ss
Attachment

cc: ~~Joe Fabiani~~
Gil Krotz
Tom Chambers
Rod Bloomquist

U.S. Department of Labor
Occupational Safety and Health Administration
6000 West Touhy
Niles, Illinois 60648
(312)-631-8200

RECEIVED

JAN 31 1978

SECY
ODS
GT
JW
N3



Results of air sampling on September 15, 1977 performed at:

Spring/Brummer Div of Borg Warner Corporation
700 South 25th Avenue
Bellwood, IL 60104

<u>JOB DESCRIPTION</u>	<u>AIR CONTAMINANT</u>	<u>RESULT</u>	<u>OSHA PEL</u>
blanking inspector	asbestos	.04 fibers/cc	2 fibers/cc
compactor/forklift	asbestos	.52 fibers/cc	2 fibers/cc
compactor/forklift	asbestos	.17 fibers/cc	2 fibers/cc
custodian	asbestos	none	2 fibers/cc
chauffering machine	asbestos	.01 fibers/cc	2 fibers/cc
grooving machine	asbestos	.09 fibers/cc	2 fibers/cc
outer diameter sander	asbestos	.05 fibers/cc	2 fibers/cc
paper blanking	asbestos	none	2 fibers/cc
paper blanking	asbestos	unacceptable	2 fibers/cc
paper blanking	asbestos	.04 fibers/cc	2 fibers/cc
assembling face plates	asbestos	.02 fibers/cc	2 fibers/cc
degreaser 292	tetrachloroethylene	6 ppm	100 ppm
degreaser 485	tetrachloroethylene	34 ppm	100 ppm
degreaser 468	tetrachloroethylene	4 ppm	100 ppm
degreaser (dept. 36)	tetrachloroethylene	1.t. 10 ppm.	100 ppm

Results are 8-hour time-weighted averages.

OSHA PEL means permissible limits by OSHA

If over .1 fiber/cc on 8 hour time weighted average or over 10 fibers/cc in 15 minute period, they require physicals.

have request of physicals even though .04 measurement, but paper blanking



Results of air sampling on September 22, 1977 performed at:

Spring/Brummer Div of Borg Warner Corporation
700 South 25th Avenue
Bellwood, IL 60104

<u>JOB DESCRIPTION</u>	<u>AIR CONTAMINANT</u>	<u>RESULT</u>	<u>OSHA PEL</u>
etch line #1	sulfuric acid	none	1 mg/M3
etch line #1	sodium hydroxide	none	2 mg/M3
etch line #1	sulfuric acid	none	1 mg/M3
etch line #2	sodium hydroxide	none	2 mg/M3
etch line #3	hydrogen chloride	.14 mg/M3	7 mg/M3
stripper	phosphoric acid	.4 mg/M3	1 mg/M3
washer	sodium hydroxide	1.t. .1 mg/M3	2 mg/M3
etch line #2	sulfuric acid	none	1 mg/M3
glue & cure	sodium hydroxide	none	2 mg/M3
check NaOH tanks	sulfuric acid	none	1 mg/M3
area sample-final	sodium hydroxide	none	2 mg/M3
inspection	MIBK	1.t. 5 ppm	100 ppm
	sodium hydroxide	1.t. 1 mg/M3	2 mg/M3
cleaning compactor	asbestos	1.t. .03 fibers/cc	2 fibers/cc
room	asbestos	14 fibers/cc*	10 fibers/cc*

Results are 8-hour time-weighted-averages.

*Result is 15 minute ceiling value, and OSHA PEL is a ceiling level.

O.S.H.A. Closing Conference
Spring Division
Bellwood, Ill.

January 12, 1978

A Closing Conference Meeting held on 1-12-78 from 10:15 a.m. to 1:00 p.m. on OSHA
Inspection of Spring Division, Borg-Warner Corp. conducted on September 13, 1977.

Present: William Stiens - Manager Loss Control, Borg-Warner Corp.
Thomas Chambers - Plant Engineer - Spring Division
James Geis - Vice President and Factory Manager - Spring Division
Joseph Fabiani - Director Industrial Relations - Spring Division
Gilbert Krotz - Manager - Safety and Security - Spring Division
Nancy Quick - Industrial Hygienist, U.S. Dept. of Labor, O.S.H.A.
Isabelle Fox - Secretary to J. E. Geis, V.P. & Factory Mgr. - Spring Div.

Nancy Quick, Industrial Hygienist, U. S. Dept. of Labor, O.S.H.A. conducted the
meeting. Tom Chambers asked what we would be discussing first. Nancy Quick
answered that it would be NOISE and that we would go over all apparent violations,
and if anyone had any questions when finished to please feel free to ask.

NOISE: Violation 1. Nancy Quick stated that it was her observation that some
people were not wearing hearing devices where there is excessive noise and where
hearing protection signs were posted. She asked if it is company policy to enforce
hearing protection.

Jim Geis stated: "Yes, they are required to wear hearing protection devices
where signs are posted and we will enforce their use."

Mrs. Quick indicated the following readings were recorded.

<u>Press #</u>	<u>Dept. #</u>	<u>Area #</u>	<u>dbA</u>
8	42	2	97
16	42	5-1	96
-	36	3	94
42	34	3	96
2	42	-	96
232	37	10	101
-	53	9	94
1400	54	13-1	100
1414	54	13-1	96
-	37	13-1	96
177	31	10	104
272	40	51	94

Nancy Quick asked for abatement periods to be established.

Mead 003797

Step 1 Engineering Survey - 6 Months

Step 2 Plan - 3 Months

Step 3 Final Abatement Complete Compliance - 2 yrs. or possibly 3 years.

Nancy Quick asked if Spring Division wished to contest and Bill Stiens answered that if there is no feasible way of complying it is our policy to contest.

Nancy Quick asked what we were doing to comply.

Bill Stiens stated that we have utilized outside engineering services to reduce noise and that many things have been done.

Jim Geis made a statement on how much money we have spent on OSHA not just to try to keep in compliance but on our own to improve safety and health standards for the benefit and protection of our employees.

ASBESTOS: Violation 1. Sec. 1910.1001. Employees working in the compactor room exposed to 14f/cc - 15 min.

Employee's name was asked, by group, and Nancy Quick stated that if it were possible to divulge she will notify Jim Geis.

Nancy Quick stated that they were using an air hose for cleaning, and asked if we have any written rule to that effect, and do we have any other method of cleaning. They would have to check on the written rule.

Mr. Stiens contended that we do have a working vacuum cleaning device designed for this work and that the employee violated the rule when he used the air hose for cleaning.

Nancy Quick asked why there is an air hose in the area and Mr. Krotz answered that this was at one time a shipping dock and at that time they had dock levelers and equipment which required air pressure to operate.

Tom Chambers asked if there is a law that you must use a vacuum cleaner as opposed to an air hose. Nancy Quick said that OSHA does have regulations and you have to devise work practices so that you are not in violation.

Nancy Quick asked "What are you going to do to abate?"

Tom Chambers stated that we have provided total enclosure from exit to receiving.

side of the compactor.

Jim Geis stated that we will get rid of the air hose.

Bill Stiens stated that we will assure that there are: Step 1. Written work rules. Step 2. A Vacuum cleaner only will be used to clean up. Step 3. Air hose will be removed.

Nancy Quick: "Would 2 weeks time be sufficient to have provided total enclosure?"

Tom Chambers stated that it was completed on October 17.

Nancy Quick: "Are you going to keep on using the present respirator?"

It was undecided as to what type of respirator should be used. Nancy Quick will get back with Bill Stiens on what type of respirator is to be supplied.

Nancy Quick: "Do you have any type of respiratory program?"

Gil Krotz answered that the employee was shown how to use it properly. Nancy Quick asked where they are stored. Joe Fabiani stated that they are easily accessible.

Nancy Quick stated that Sec. 1910.134 has everything listed that you will need to be in compliance.

Nancy Quick: "Do you supply uniforms for compactor operator?"

Joe Fabiani stated that we supply all of our employees uniforms but it is not compulsory to wear them.

Nancy Quick asked if we notified the Union Linen Company of the asbestos exposure.

Bill Stiens stated that we will follow up notifying Union Linen of the asbestos exposure.

Tom Chambers asked a question regarding the submission of reports. Nancy Quick stated that a report must be submitted when a violation is corrected and that must be done before the end of the abatement period, and it is good practice to submit progress reports on violations with a long abatement period at approximately 30 day intervals.

Asbestos - Violation 2. 1910.1001(d)(4)(iii)(b) Failure to notify Union Linen Company that coveralls may contain asbestos fibers.

W. Stiens: "We will follow up and notify Union Linen Company."

Violation 3. 1910.1001(d)(4)(iii)(c) Contaminated clothing transported in open bins. Abatement - 30 days.

Nancy Quick asked about Monitoring. Personal monitoring should be done every six months.

Violation #4. Monitoring Compactor Room on 6 month intervals. Abatement - 2 months

Nancy Quick asked many questions about our concern over readings on fiber limit and what we thought about it and were going to do about it, and why didn't we, etc.

Bill Stiens: "We had many readings prior to that which were not above the 10 fiber limit. The Industrial Hygienist from Nalsco indicated only one high reading and we considered this to be an unusual reading."

Nancy Quick asked "Do you give employees an opportunity to see monitoring?"

It was agreed that if the employee wished to see it, it would be made available.

Caution Signs and Labels:

Nancy Quick stated that we must have caution signs in compactor room.

Violation #5. Failure to provide caution sign indicating asbestos exposure in compactor room and failure to label laundry with caution label.

Abatement: 2 weeks.

Caution signs will be posted and laundry will be labeled with caution label.

Nancy Quick: Places of employment were not maintained free of accumulation of asbestos fiber outside of compactor room east wall and saturation machines #5 and #2 upstairs.

Violation #6. Visible asbestos accumulations.

It will be cleaned up.

Violation #7. Failure to notify employee of exposure to asbestos fibers within 5 days, in excess of allowable standards = 19 fibers per cc. 5-11-76.

Bill Stiens stated that the reason the employee was not notified was because all but one reading indicated that we were in compliance and we felt that the employee was not over-exposed.

Medical Examinations

Violation #8. Failure to provide medical examinations for employees in compactor room, Dept. 53 area 9; band liner blanking, sand and groove Dept. 40, area 5-1; final cure, Dept. 47, area 4-1; final inspection packing, paper blanking, Dept. 32.

Bill Stiens stated that the Assistant O.S.H.A. Regional Administrator, M. Brickman, stated in a telephone conversation Jan. 10, 1978 that physical examinations are required only if a fiber concentration exceeds a 0.1 fiber for an 8 hour TWA or a 0.5 fiber ceiling.

Bill Stiens stated that for the record, on the past advice from OSHA and N.I.O.S.H. we did not order physicals based upon the readings at that time in our possession. (Mr. D. Jenetka, Industrial Hygienist, OSHA Chicago, January 15, 1973, 1 fiber/cc).

Nancy Quick: "Are you going to provide medical examinations?"

Bill Stiens: "Yes, for the compactor room employees."

Abatement Period: 1 month for physicals and notification of being in excess.

Clean up of asbestos fibers - 2 weeks.

Flammable and Combustible Liquids:

Nancy Quick stated that on Saturation Line #1 they were mopping the floor with MEK and pouring MEK from metal bucket on floor and using it for a cleaning liquid.

Violation #1. Misuse of flammable liquid in Saturating Room.

Action will be taken to insure that employees do not misuse flammable liquids.

Emergency Respirators

Violation #1. Air line respirator used by maintenance to service degreasers violated Sec. 1910.134(d)(2)(ii).

Not provided with CO or high temperature alarms and filters.

Violation #2. Employees not trained in the use of respirators.

Violation #3. Respirator equipment not inspected monthly and inspection results recorded.

Protective clothing to be worn in the degreaser room was discussed and some other items that were covered were rediscussed.

Nancy Quick exhibited a small brochure from OSHA which she read each citation category requirements and our legal rights to contest, etc. and stated that we would be receiving a copy of this brochure (with our notice of citation) which should clarify any further questions we might encounter. She concluded the meeting at 1:00 p.m. and stated that we may contact her if we have further questions before the citation is issued.