

MAREMONT
CORPORATION

INTER-OFFICE CORRESPONDENCE

TO: R. C. Rogers

DATE: November 3, 1975

FROM: A. P. Staszak

COPIES TO:

R. A. Hemmelgarn
W. K. Knight

LOCATION: Paulding

SUBJECT: OSHA EXPENDITURE - SUPPLEMENT TO REPORT
DATED SEPTEMBER 8, 1975

PLAINTIFF'S EXHIBIT

MAR-491

OSHA EXPENDITURES FOR 1976

Dust Control

The following is a listing of machines by department where work is required to comply with OSHA Standard 1910.1001 covering operations using asbestos in their processes. Projected dollar values have been extracted from the \$100,000 proposal submitted on the Annual Business Plan for 1976.

Modification of branch ducts and design fabrication and installation of dust pick ups will be required at the following machines.

Block Department - Projected Expenditure \$30,000

#1539 Saw	#1619 Drill
#2555 Internal grinder	#1620 Drill
#1632 Belt grinder	#1621 Drill
brander	#1698 Drill
#1629 Belt grinder	#1343
#1624 Grinder	packing station
#1618 Drill	gang saw

Disc Department - Projected Expenditure \$50,000

Hammond Grinder	G-3 grinder
bevel grinder	packing station
brander	
pill machine** - where unprocessed matter is transferred into hopper	
presses**	

* Includes modification of existing collector for improved efficiency.

**\$40,000 of the \$50,000 will be required for design, fabrication and installation of an additional bag house to collect dust generated at these locations due to the limited capacity of the present collector.

Lining Department - Projected Expenditure \$10,000

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#1774 I.D. grinder
groover
side grinder
hard feed saw
#1815 I.D. grinder

#2553 I.D. grinder
O.D. grinder
little ford mixers
packing station (drill)
#1873 belt grinder

The remaining \$10,000 will be required for additional air make up units to improve efficiency of dust collection systems in all departments. This is necessary because as the collectors exhaust air from the plant, a negative pressure system is developed. With this happening, the proper transport conveying velocity cannot be achieved at the dust pick ups.

Alternative

Substitute alternate material such as fiberglass for asbestos. No standard as comprehensive exists for employee exposure to fiberglass. Of course there is no guarantee that a new standard will not be promulgated, in fact a standard could be enacted which would be as stringent as the asbestos standard.

Noise Control

To comply with the OSHA Standard 1910.95 of 90 decibels, A-weighted sound level, work will be required at the following machines. Bearing in mind the \$7,500.00 proposal, this could possibly resolve noise problems at 3 machines.

Block Department

Block drill (2 hole)
saws 1639, rip saw

Lining Department

lining saws
side grinder
lining grinder #1797
lining grinder #1806
lining grinder #1793

Alternative

Wait until we are cited and fined by OSHA before taking care of other machines where noise exceeds the permissible level.

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Guards and Miscellaneous

To comply with OSHA asbestos housekeeping standard 1910.1001 (H) (1), the following will be necessary.

Purchase vacuum units (10-15 required) to service entire operation. Bearing in mind that acceptable units range between \$1,500 and \$5,000 in price, the only avenue open would be to purchase 3-4 units at a figure of around \$4,000 and hope that when we are inspected by OSHA, that housekeeping is satisfactory.

This would leave around \$4,000 to cover cost of personal protective equipment, lunch rooms, fabrication of machine guards, guard railing and other safety devices as the needs arise. Whether this amount will be adequate is questionable.

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OSHA EXPENDITURES 1977

Although much of this work needed to be accomplished in 1976, the following shall represent 1977 requirements.

Dust Control

Although change rooms were removed from the proposed budget for 1976, I reiterate my previous conviction that \$30,000 will be required to construct same. Since we were cited for violation of this standard on December 14, 1973*, and chances being that dust levels will remain unacceptable in certain areas, we could be issued a citation for a repeat or willful violation for failing to construct change rooms.

To reduce operator exposure to asbestos, up to 30,000 would be required for improvement of asbestos handling at mixers, Block and Disc presses.

Ductwork with hoods will need to be installed at the Clutch winders at a cost of approximately \$5,000.

Due to EPA regulations, the wet scrubbers serving the Block Department and Lining Department will require conversion, modification, or total replacement with dry type bag house collectors. Cost for this work could exceed \$200,000. Start late 1977. Approximately \$150,000 will be required to construct an agglomeration system to process asbestos waste material (dust) to a form which will not release asbestos fibers into the air.

Noise Control

Up to \$20,000 may be required to comply with the 90 DBA regulation. This represents work required to install enclosures, barriers, etc., at machines left over after 1976 expenditures.

Guards and Miscellaneous

Costs could run between \$20,000 - \$30,000, depending on needs after conclusion of fiscal year 1976. This would cover:

1. annual physical exams
2. personal protective equipment
 - a. safety glasses
 - b. safety shoes
 - c. respirator
 - d. ear muffs
3. machine guarding

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4. building alteration (guard rails, etc.)

*This same violation required us to install dust controls at the Block presses at a cost of \$100,000. This work is scheduled to be completed by November 24, 1975.

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