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Date	To	Location and mail code
January 16,1979	R. Wingartner	Santa Clara 256

Subject	From	Location and mail code
REPORT OF VISIT TO SANTA CLARA A/C PIPE PLANT - OCTOBER 26, 1978	T. C. Shaffer/dbm	VF Corp. 4

PLAINTIFF'S EXHIBIT

CT-657

cc: T. A. Dougherty - Blue Bell 2126
J. G. Heil - Blue Bell 2126
J. P. McGinley - VF P&PG 2B
Dr. L. J. Mellon - VF Corp. 4

The following is a summary of my observations, comments, and recommendations as a result of my visit to Santa Clara on October 26, 1978. Thank you for the hospitality you extended to Owen Kittilstad, Dick Taylor, and me during that visit.

General Comments

I was well impressed with the industrial hygiene program being implemented at your plant. Health and Safety is apparent as a top management priority as witnessed by your clean plant, well thought out safety manual, and industrial hygiene documentation.

Respirator Program

Observations: The respirator program is a written program in the form of memos describing instructions for use, washing and disinfecting instructions, and required use areas. Gary Horne had been involved in the respirator program, but he is no longer with the company. I viewed the half-mask respirator cleaning storage area in the Safety Supervisor's office. Clean respirators are stored in plastic containers and issued to workers as needed. This method allows for a responsible person to check each respirator for broken parts before it is reissued. Another good feature of your program is that each worker is assigned his own respirator.

Comments

Whenever a company issues respirators to employees, that company assumes liability. Employees must be trained in the use of respirators and especially in the limitations of respirators. For instance, an employee might be afraid to go into a confined space without any protection. But with the "protection" of a "respirator" the employee might consider the entry to be safe. If the oxygen content was low in that confined space, the employee and the company would be in jeopardy.

Establishing a respirator program is a job of custom fitting a set of guidelines to your company's specific needs. I have enclosed a sample respirator program, the Cal OSHA standards, and the federal OSHA Compliance Officer Guidelines for reviewing respirator programs.

I would be very pleased to look at and help review your written respirator program. If there are any questions in writing it, please give me a call.

Recommendations:
Formalize a respirator program consistent with OSHA guidelines. Basic aspects of this written program include: selection, employee instruction, assignment, cleaning, storage, inspection, surveillance, evaluation, medicals, and approvals.

Airborne Fiber Sampling
Observations: Your asbestos air sampling program presently meets the OSHA criteria. The NIOSH method has been used by a trained fiber reader. Air sampling results are posted to notify employees of results.

Comments
The need for thorough industrial hygiene air sampling is well recognized in our A/C pipe plants at this time. I am currently working on industrial hygiene guidelines for asbestos. These guidelines will define the legal requirements in working with asbestos and will address future air sampling needs of our company. It has become apparent that it is not enough simply to meet the air sampling requirements of the government. We must assure ourselves that we know the fiber exposure levels for all of our employees. This can be accomplished by air sampling which includes samples from employees eight-hour work days and from all employees on all shifts at all positions.

I have attached a copy of an air sampling data sheet and an air pump calibration sheet which I have found to be very helpful in gathering information about air samples. The sampling data sheet has proven itself very helpful as a memory jogger. The forms will be very helpful in evaluating air sampling results to determine when and by what methods fiber levels may be reduced.

By reviewing air sampling data sheets, you might be able to pin-point problem areas, i.e., an individual employee with especially sloppy work habits, or a certain size of product or production run which has characteristically higher fiber levels at a specific operation.

Recommendations:
(1) Air sampling procedures must be reviewed to include samples which reflect an employees eight-hour day. This sampling would typically include two 3-1/2 hour samples plus one or two short term samples at the employees highest exposure area.

(2) Air sampling must be scheduled to sample all employees at all job functions on all shifts. (There is nothing wrong with a second shift foreman observing and recovering the pump and filter at the end of that shift).

(3) The air sampling data sheet should be utilized to gather information related to air sampling. The sheet must be filled out accurately and completely to be an effective tool in assessing problem areas.

I wish to thank you again for your hospitality and the time you spent with us. I look forward to your comments and hope that you will feel free to call me about questions you have on these or other industrial hygiene matters.

Enclosures:

OSHA Chapter 12 IHFOM
Example of written respirator program
Air sampling data sheet - (these are only xerox copies. I will be having them printed for general distribution)
Air pump calibration sheet
Cal OSHA respirator standards