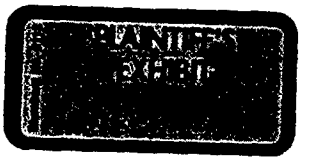
UNIROYAL, Inc.

Oxford E-G-1
(Location)



TO: D. E. Dudrow

FROM: L. F. Dieringer

DATE: June 25, 1973

SUBJECT: OSHA Compliance Violations at Hogansville

The airborne asbestos concentrations have been above both the 8 hour time-weighted and ceiling concentration a majority of the time in the carding area of the Asbeston Plant since January 1972, the opening and blending room, since February 1973 and the spinning-twisting-fly-frame and weaving areas during April and May, 1973.

Based on these measurements, the plant has been in violation of the following sections of Part 1910.93(a), Standard for Exposure to Asbestos Dust for the areas and time periods specified above.

(d)(1)	the wearing of respirators where either exposure limit is exceeded.
(d)(3)	special clothing is required where the ceiling concentration is exceeded.
(d)(4)(ii)	two separate clothes lockers per employee to prevent cloth contamination is required where either exposure limit is exceeded.
(d)(4)(iii)	laundering of special clothing is required.
(g))1))i)	posting of caution signs is required where either exposure limit is exceeded.
(h)(i)	housekeeping, place of employment shall be maintained free of asbestos accumulations.
(i)(3)	employees exposed any time to airborne concentrations above the exposure limit shall be notified in writing of such exposure.
(j)	a comprehensive medical examination as described in this section is not being provided.

L. F. Dieringer

L. F. Dieringer

LFD:rg

UNIROYAL, Inc.

Division Engineering - Winnsbor
(Location)

July 30, 1973

Mr. R. C. Hunt
Hogansville

Subject: Asbestos Dust Samples - Employee Notification

Ref: 1. Federal Register - Vol. 37
No. 202 - 10/18/72 - 1910.93a
(i)(3) pp 22144 Col. 2 (top)
2. Letter - L. F. Dieringer (E-G-1) 6/27/73
3. Letter - B. D. Bittinger 6/22/73
Item VI (b) pp6
4. Letter - B. D. Bittinger 7/16/73

1910.93a (i)(3) "Employee Notification. Any employee found to have been exposed at any time to airborne concentrations of Asbestos fibers in excess of the limits prescribed in paragraph (b) of this section shall be notified in writing of the exposure as soon as practicable but not later than 5 days of the finding. The employee shall also be timely notified of the corrective action being taken."

Based on personal discussions and Mr. Dieringer's letter (6/27/73), I recommend the following sampling and notification procedure:

Take plant-wide airborne fiber samples during two months of each year. The sampling periods should be spaced at six month intervals as required in the OSHA regulations. Notify each employee who is exposed to excessive fiber count concentrations within five (5) days as required.

Take fiber count samples only in specific areas where engineering projects and special studies are under way during the other 10 months of the year. Notify any employees exposed to excessive concentrations as required.

INTERCOMPANY CORRESPONDENCE

0004569

The first specific areas to be sampled would be Carding and Blending. We have previously agreed that people in these areas will be wearing company-provided clothing. Respirators will also be worn by 9/1/73 if dust count concentrations are above the specified limits. If the samples in the study areas are above limits, then we will have to only notify the employees in these areas, and as I mentioned above, they will be wearing protective clothing, etc., anyway, so they will not be surprised to receive the required letter of notification.

I believe it is important to take the special samples in specific areas as described above and keep this data as a part of our OSHA records so that: (1) we can determine results of engineering projects, and (2) we can demonstrate an improvement in airborne samples to an OSHA inspector if and when we are negotiating for additional time to reach compliance.

B. D. Bittinger

B. D. Bittinger (AB)

ab

cc: Messrs. K. H. Becht
L. M. Boulware
B. E. Carden
W. M. Davis
L. F. Dieringer
J. L. Dorrier
D. E. Dudrow
E. A. Morris
Dr. T. H. Newby
R. P. Sprayberry
F. C. Phillips
C. H. Sigler

UNIROYAL, Inc.

Oxford E-G-1
(Location)

TO: D. E. Dudrow

FROM: L. F. Dieringer

DATE: August 2, 1973

Received telephone call from Ed Morris, TAC Winnsboro at 2:40 p.m. on August 1, 1973 who had received a telephone call from a Bob Curtis, NIOSH Cincinnati.

Mr. Curtis asked permission to make feasibility study of asbestos operations at Hogansville, consisting of walk-through and fiber counting. Plans are 500-600 fiber counts - 8-1 hour studies/15 employees/day/week over August, September and October, using data to arrive at time weighted average concentrations.

If we agree, will be on informal study. Data will be considered in recommendations for revisions of OSHA asbestos standard. Would like to do study if our data comparable to fiber counts mentioned by Mr. Curtis.

	NIOSH	UNIROYAL, June '73
blending	9.3 f/cc	8.0
carding	12.5	8.0
spinning	11.0	3.5
twisting	7.1	3.5
winding	6.0	3.0
miscellaneous	4-5	6.0

Would like to start middle of August.

L. F. Dieringer

L. F. Dieringer

LFD:rg

UNIROYAL, Inc.

Oxford
(Location)

To: D. E. Dudrow

From: L. F. Dieringer

Date: April 22, 1974

Subject: Hogansville Meeting, April 17, 1974
Re: OSHA Citations

A meeting was held at the Hogansville Plant on April 17, 1974, to set goals for attaining compliance with the OSHA citations resulting from the OSHA inspection of March 4 through March 7, 1974. Attending were:

L. M. Boulware, Production Manager, Textile Division
J. L. Dorrier, Manager of Personnel and Training, Textile Division
R. P. Briggs, Textile Division Engineering
W. D. Crawford, Plant Manager, Hogansville Plant
B. Carden, Overseer Asbeston Plant, Hogansville
R. Sprayberry, Industrial Relations Manager, Hogansville
B. Philpott, Plant Engineer, Hogansville
L. F. Dieringer, Corporate Industrial Hygienist
Various supervisory personnel, Asbeston and Stark Plants

Asbestos Citation:

Considered Asbeston Plant, department by department, and set target dates for projects, which it is hoped will bring the airborne concentrations of asbestos below the permissible limit of exposure in the areas where cited; namely, opening, blending, carding, and wearing. Plan to shoot for short range concentrations of less than 3.5 fibers/cc and long range concentrations of less than 2 fibers/cc. (1976 standard)

1. Opening and Blending - All agreed that the hazard is the actual physical handling of asbestos. The main target area is to keep employee out of Mix Room.
   Accomplishments to date: blending line enclosures, covers on carts, covers on Garnett machine, enclosure of baling machine, door closures on stock rooms.
   Investigate:
   (a) Increase exhaust on blenders.(6/15/74)
   (b) Change in handling procedure to keep employee out of Mix Room - box, compact, and convey. (report by 5/15/74)

(1) Move asbestos carts closer to hopper during loading.
(2) Drape hopper drop.
(3) Mechanical tamp asbestos into box instead of by hand.

2. Carding - Control measures being implemented:
   (a) Repairing humidity heads
   (b) Adding additional humidity, especially in West carding; and opening and blending where none was present before
   (c) Areas to be designated where respirators needed
   (d) Hood fastened down on card feed hoppers
   (e) Vacuum cleaning stepped up

   Investigate: (report 5/15/74)
   (1) Exhaust on lick rings on cards drawing dust down through floor
   (2) Hole in floor under cards to sweep waste into with plastic bag located underneath to catch waste.
   (3) Inquiry of vacuum cleaner manufacturer for special fittings for cleaning under cards
   (4) Try grinding card rolls with plastic enclosure connected to card exhaust (4/25/74)
   (5) Contact John Manville re: card feeding
   (6) Concept of automated card hopper feeding (8/15/74)

Investigate possibility of building and machinery cleaning time being included in job functions in Asbeston Plant.

3. Spinning, twisting, fly frame, winders and quillers not cited; feel in good shape. Must keep on guard, however, for let down.

4. Weaving - Accomplished since OSHA inspection:
   (a) Increasing humidity (shooting for 70 to 80 percent RH)
   (b) Repair humidity heads
   (c) Accelerated steam cleaning program for looms
   (d) Moved two large wall exhaust fans from south wall to east wall between card and weave rooms
   (e) Covered looms not in use with poly wrap
   (f) Scrapped two looms not being used. Will possibly scrap four more.
   (g) Instituted more frequent clean ups
   (h) Increasing moisture applied to asbestos to be woven

5. Mr. Boulware asked L. F. Dieringer's opinion on quotation by outside engineering concern to:
   (a) Conduct engineering study on Wheelabator serving Carding Department - $2,000
   (b) Suitable emission study - $3,000. This was requested by B. Philpott to determine whether or not Wheelabators are trapping asbestos fibers, whether any fibers are being recirculated to building in cooler weather when air is recirculated to conserve heat, and if so, do we stop recirculating air with added burden of providing tempered air or provide secondary "absolute" filter system. Engineering study was recommended, as it is considered necessary to establish efficiency of Wheelabator. The company does not have the capibility for such a study.

Cotton Citation:

1. Expect to have new exhausted Garnett Machine in operation by May 15, 1974, to handle reusable wastes. Expect this action will abate this part of Cotton citation.

2. High-speed carding in Stark Mill. Steps to be taken with report time of June 15, 1974:
   (a) Check vacuum system to dust house
   (b) Better maintenance of plenum on doffer covers
   (c) Use vacuum instead of air hoses for clean up

Noise Citation:

1. Abbott Quiller - Investigate cutting off of air used as helper to move quills. There appears to be no need for this air mover. Also, the air is being exhausted through a small cloth ban, and no one can explain the purpose. Stoppage of these air discharges will abate this part of the noise citation. (June 1. 1974)

2. Duraloc Machine - Reservations about abating this part of citation. Measures being considered:
   (a) Contribution of air conditioning system to overall noise problem - isolation of air conditioning system (report May 1, 1974 of measurements in area with air conditioning and machinery on and off)
   (b) Replacing chain drives with D. C. drives
   (c) Change bronze bushings to nylon on stroke arms
   (d) Total enclosure of machines
   (e) Accoustical material on inside of machine
   (f) Partitions in area

Attached are copies of reports from supervisors about our progress in attempting to abate OSHA citations. A more formal report of this meeting is supposed to be issued by the Hogansville Plant.

F-233 REV. 2-67

cc: Messrs. C. S. Barnwell
C. R. Owings
B. L. Philpot
W. H. Robertson
R. P. Briggs
R. P. Sprayberry

UNIROYAL, Inc.

Hogansville, Ga.
(Location)

April 16, 1975

TO: Mr. W. D. Crawford
Building

SUBJECT: Reduction of Dust Level in Asbeston Plant

As reported April 11, 1975, work was started to cover four (4) steps as outlined in R. L. Hobbs' memo of March 25, 1975 as a possible means to reduce asbeston dust levels.

Dust levels and running conditions will be determined on all tests using the following 80/20 mix:

54% Bell 3K asbestos
26% Cass A
20% Polyester Type 310

1. Selected numbers 9 and 10 cards.

   A. Check present production setup for running conditions and dust counts.

   B. Reduced cards speeds by 11.5%.

   C. Will remove one-half the number of workers and strippers in breaker card only.

   D. With workers and strippers out, change back to normal speeds.

2. Tests will be run on fly twisters numbers 1 and 2.

   A. Check running conditions and dust counts on each of the four (4) tests as listed above for cards, including reduced speeds (approx. 10%).

3. It has been determined that increased humidity has helped reduce dust. Humidity has been increased and additional heads added.

4. An overspray has been on trial in card hopper No. 8 for several days. However, results are not conclusive with unit in hopper. We now have the second overspray unit and both units are scheduled to go on blending line for additional trials.

B. E. Carden
sls

INTERCOMPANY CORRESPONDENCE

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