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MEAD technical papers

TECHNICAL PAPERS DIVISION

THE MEAD CORPORATION SOUTH LEE, MASSACHUSETTS 01260 • (413) 243-1231

March 21, 1973

Mr. James Niblick
President & General Manager
Borg-Warner Corporation
Spring Division
700 South 25th Avenue
Bellwood, Illinois 60104

Dear Mr. Niblick:

I am writing in response to your interest concerning how we stand in connection with OSHA requirements for the handling of asbestos fibers when we are producing friction paper for you.

First let me say that for many years we have been concerned with the problems of handling asbestos fibers, and have periodically made sampling tests of the atmospheric conditions in the area where the asbestos fibers were being furnished to the process. As you might suspect, it has turned out that our method of sampling did not prove to be the one adopted by OSHA, therefore the data collected has no validity under the new requirements; however, the data obtained was examined by professional safety consultants and deemed to be indicative of acceptable levels of contamination.

As matters stand today, technically we have not been inspected by OSHA in the paper mills in South Lee - simply because when the OSHA inspector came to visit us last fall he came in the company of the area inspector of the Massachusetts Division of Industrial Safety - who had just completed a very thorough two and one-half day inspection of the paper mills; consequently, the OSHA inspector devoted his time to examining our Morart printing plant. The decision was logical since the Massachusetts Safety Division promptly adopted the OSHA rules and regulations, and the paper mill inspection was made in accordance with them.

As a result of the state inspection we were asked to notify them when we would be running asbestos paper, so they could have an engineer from the Massachusetts Division of Occupational Hygiene visit us to make appropriate tests during the run. This

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was done on November 22, 1972 while we were running friction grade 650-W, and the sample data they obtained using the approved OSHA method is tabulated below:

Sample	Minutes	Action/Area	Asbestos fibers greater than 5 microns per milliliter of air
1	63	In machine room, at winder, while processing friction paper.	0.1
2	56	(Same as Sample 1)	0.1
3	15	Disposing of asbestos paper scrap in basement "broke" department.	4.7
4	44	In basement broke department working near scrap baling machine. Asbestos exposure from nearby asbestos scrap collector room.	0.4
5	7	Two men feeding asbestos into slush master.	2.7
6	7	(Same as Sample 5)	2.7
		MAXIMUM ALLOWABLE CONCENTRATION	5.0

The above refers to the asbestos fiber standards effective July 7, 1972.

As a result of this inspection the Massachusetts Division of Industrial Safety judged the atmospheric tests were not indicative of a hazardous exposure but that our method of handling the disposal of scrap obtained when rewinding the paper was needlessly exposing our "broke" employee to a high fiber concentration on an intermittent basis (Sample 3 in the above table). They concluded three actions were necessary on our part:

1) All employees exposed to asbestos fibers must be included in a Medical Surveillance Program. This program had to begin before January 31, 1973 and be continued at least annually thereafter. At this time we have given all affected employees a

chest roentgenogram - and the results are all negative. We are in the process of two additional pulmonary function tests - forced vital capacity and forced expiratory volume, and this is programmed to be completed by the end of March, 1973. We are also going to give annual physicals to all employees who are exposed to air borne concentrations of asbestos fibers.

2) We must correct the method of handling the excess strips from the rewinder, which become waste ("broke"). We have three months to accomplish this, and this period will end in the middle of April. As an approach to this problem we wondered if you could accept the end rolls coming off the rewinder with unslit edges (thereby eliminating the problem) and sent you some rolls for evaluation. Based on a meeting which took place approximately 10 days ago we understand this is impractical from your viewpoint, so this solution has been discarded. In its place, in the current run, we are finding we are able to wind this up at the rewinder so it is not necessary to convey it by air to the "broke" area. We expect this method to satisfy the requirements. We might mention that this rewinder is equipped with a system which directs a flow of air across the sheet as it is being slit and deposits any air borne particles collected in a water stream - thus resulting in the low values of Samples 1 and 2 in the table.

3) The inspection revealed a few broken bags of asbestos in storage, therefore we were required to seal these as soon as possible. This has been done, and suitable instructions issued concerning any future damaged bags.

We can anticipate there may be some question in your mind relative to other areas of concern, namely: 650-W is not the friction grade with the highest asbestos concentration; since some asbestos fiber can be obtained in repulpable bags which greatly reduce air contamination - can this approach be expanded; what our thoughts are concerning the more stringent requirements which will apply July 1, 1976. Commenting briefly on these - despite the fact that other friction grades can have higher asbestos content the batch process method which applies here leads us to believe the air contamination will not be in a linear relationship to the asbestos content - and the low values obtained with 650-W will provide us adequate margin for us to remain in compliance. We are not resting with this judgmental approach, however, and presently have on order three OSHA

approved samplers to permit us to document our operating conditions across the entire range of friction papers. This program will start as soon as the equipment is received. As far as repulpable bags are concerned - quite frankly we believe it possible OSHA packaging requirements may do away with this present assist, but should this happen the asbestos fiber presently packaged in this manner will simply fall into the same category as the other fibers and the critical issue will continue to be the atmospheric conditions existent when the fibers are being furnished and processed. And finally, concerning 1976 - we have long recognized asbestos fibers are hazardous, our management policy in all areas of pollution has been to move promptly to meet the standards established by state and federal governments, and our expectation is that we will be meeting the 1976 requirements well in advance of the deadline.

We trust this covers the matter to your satisfaction, however, if we have inadvertently overlooked some area of concern, please let us know and we will give you our thoughts concerning it.

Sincerely,

THE MEAD CORPORATION

E. K. Bancroft
Manufacturing Manager
Technical Papers Division

EKB:s
cc: Mr. M. DeAno
Mr. E. Ferris
Mr. W. McColl
Mr. C. Pacola
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bc: Mr. S. Dalheim
Mr. J. Genzabella ✓
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