FILE NAME: Dana Corporation (DAN)

DATE: 1973 Apr 25

DOC#: DAN013

DOCUMENT DESCRIPTION: Memo RE Handling of Hydramatic ASBESTOPRENE Oil Pan Gaskets & Caution Labels

ROUTING SLIP

TO: R. S. McCranahan
C. I. Hayden

REMARKS:

Any suggestions?

FROM: DATE:

W. J. Sheehan 4/30/73

Plaintiff's Exhibit
Dana-14

PLAINTIFF'S EXHIBIT 1

VPD-188-0002118

Plaintiff's Exhibit 108328

PLAINTIFF'S EXHIBIT DANA-0014

FROM OR COPY OF JFF: mam, File

DANA CORPORATION — Victor Products Division, Detroit

INTRA-COMPANY COMMUNICATION

SUBJECT Hydramatic Division, GMC - OSHA DATE April 25, 1973

TO J. E. Lane

As you know, we sell Hydramatic ASBESTOFRENE oil pan gaskets for service use. About half of what we ship Hydramatic is re-shipped, in our cartons, to AC Spark Plug for their service packaging. The remainder is packaged by Hydramatic and sent to GMPD.

A General Motors safety inspector has toured Hydramatic, and reported unacceptable levels of asbestos dust in their packaging location. He has directed Hydramatic to vacuum the residue out of our cartons before the cartons are disposed of. This residue must be plastic bagged, labeled, and disposed of in land fill.

In addition, he requests that our cartons be labeled with the cautionary statement per the attached page from the Federal Register.

I am to write Mr. H. J. Thomas, Safety Director at Hydramatic, indicating we will comply with this request.

This situation could be a pocketful of fish hooks, both in our plant and at Hydramatic. I don't know how the union will react to this caution label. Will Messrs. Dehr, Lillis, McGranahan, et all, review it and let me know how to respond to Hydramatic.

cc: S.M.L.
R.S.McG.

J. F. Feldmann/hjp

encl.

Bill - If they want labels, why not put them on? The potential union reaction could be handled by definition in the Federal Register which clearly exempts hazard fibers from cartons for Control. No. [illegible] 4/27/73

VPD-188-0002119

be related to another job or given the opportunity to transfer to a different position where clothes he is able to perform with the same employer, in the same geographical area and with the same seniority, status, and rate of pay he had just prior to such transfer, if such a different position is available.

(3) *Special clothing:* The employer shall provide, and require the use of, special clothing, such as coveralls or similar whole body clothing, head coverings, gloves, and foot coverings for any employee exposed to airborne concentrations of asbestos fibers which exceed the ceiling level prescribed in paragraph (b) of this section.

(4) *Change rooms:* (i) At any fixed place of employment exposed to airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section, the employer shall provide change rooms for employees working regularly at the place.

(ii) *Clothes lockers:* The employer shall provide two separate lockers or containers for each employee, so separated or isolated as to prevent contamination of the employee's street clothes from his work clothes.

(iii) *Laundering:* (a) Laundering of asbestos contaminated clothing shall be done so as to prevent the release of airborne asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section.

(b) Any employer who gives asbestos-contaminated clothing to another person for laundering shall inform such person of the requirement 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.

(c) Contaminated clothing shall be transported in sealed impermeable bags, or other closed, impermeable containers, and labeled in accordance with paragraph (g) of this section.

(5) *Method of measurement.* All determinations of airborne concentrations of asbestos fibers shall be made by the membrane filter method at 400–450 × (magnification) (4 millimeter objective) with phase contrast illumination.

(6) *Monitoring*—(i) *Initial determinations.* Within 6 months of the publication of this section, every employer shall cause every place of employment

(ii) *Sampling frequency and patterns.* After the initial determinations required by subparagraph (1) of this paragraph, samples shall be of such frequency and pattern as to represent with reasonable accuracy the levels of exposure of employees. In no case shall the sampling be done at intervals greater than 6 months for employees whose exposures to asbestos may reasonably be foreseen to exceed the exposure limits prescribed in paragraph (b) of this section.

(iii) *Employee observation / monitoring.* Affected employees, or their representatives, shall be given a reasonable opportunity to observe any monitoring required by this paragraph and shall have access to the records thereof.

(g) *Caution signs and labels.* (1) *Caution signs.* (i) *Posting.* Caution signs shall be provided and displayed at each location where airborne concentrations of asbestos fibers may be in excess of the exposure limits prescribed in paragraph (b) of this section. Signs shall be posted at such a distance from such a location so that an employee may read the signs and take necessary protective steps before entering the area marked by the signs. Signs shall be posted at all approaches to areas containing excessive concentrations of airborne asbestos fibers.

(ii) *Sign specifications.* The warning signs required by subdivision (i) of this

[illegible] Breathing Asbestos Dust May Cause Serious Bodily Harm

Breathing between them shall be at least equal in the height of the taller of the two lines.

(2) *Caution labels.*—(i) *Labeling.* Caution labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers or to their containers, except that no label is required where asbestos fibers have been modified by a bonding agent, coating, binder, or other material so that during any reasonably foreseeable use, handling, storage, disposal, processing, or transportation, no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section will be released.

(ii) *Label specifications.* The caution labels required by subdivision (i) of this subparagraph shall be printed in letters of sufficient size and contrast as to be readily visible and legible. The label shall state:

Caution
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause
Serious Bodily Harm

(iii) *Housekeeping.* (i) *Cleaning.* All [illegible] internal surfaces in any place of employment shall be maintained free of accumulations of asbestos fibers if, with their dispersion, there would be an excessive concentration.

(2) *Waste disposal.* Asbestos waste, scrap, debris, bags, containers, equipment, and asbestos-contaminated clothing, consigned for disposal, which may produce in any reasonably foreseeable use, handling, storage, processing, disposal, or transportation airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section shall be collected and disposed of in sealed impermeable bags, or other closed, impermeable containers.

(i) *Recordkeeping.*—(1) *Exposure records.* Every employer shall maintain records of any personal or environmental monitoring required by this section. Records shall be maintained for a period of at least 3 years and shall be made available upon request to the Assistant Secretary of Labor for Occupational Safety and Health, the Director of the National

VPD-188-0002120