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Attached Report



Inter-Office Communication

March 2, 1976

To Art Hughes, Administrative Assistant, Chrysler Department

From Frank Mirer, Ph. D., Industrial Hygiene Consultant
Social Security Department

Subject Chrysler Corporation
Trenton Chemical Plant
Trenton, Michigan
Local Union 372, Region 1A

Inspection: Industrial Hygiene Inspection - Asbestos Exposure
Requested by Joint National Committee

Date of Inspection: ~~February 25, 1976~~

Union
Representatives: Bob Smith, President, Local Union 372
Gary Pickrell, Safety Representative
Pete Bellich, Committeeman
Dave Pennington, Committeeman
Dick Clayton, Chief Steward

Company
Representatives: Dan Glazer, Corporate Industrial Hygiene
Elmer Lombard, Plant Safety Supervisor
John Lardie, Personnel Manager (closing conf. only)
Tom Lang, Labor Relations Supervisor (closing conf. only)

This plant visit was requested by the Chrysler Department to review, survey and recommend corrections of health hazards of asbestos use at this location.

The day of the visit was sunny with a temperature in the 50's indicating efficient ventilation conditions and ample supply of cooling air for relief of heat stress.

The plant tour was made with the above Union and Company representatives.

\$ 1.29 x 10⁶ per 100 ft³ air
with 1 ft³ air

Asbestos is used in two locations. In the Chemical Plant, with about 100 hourly employees, asbestos is an ingredient in various products such as sealers. Much greater quantities of asbestos are used in the Friction Products Building, with about 220 hourly employees, in the manufacture of brake linings and disc brake pads.

I. General

According to industrial hygiene reports submitted by the Corporation and the State of Michigan, airborne asbestos fiber counts are below the current standard (5 fibers/cc) at all routine operations except the cleaning of the Fr. Lodge mixer in the Friction Products Plant. A respirator is required at this location. In a number of areas the exposure is considerably below standards. This standard is scheduled to be reduced to 2 fibers/cc in July 1976, and a further reduction to one-half fiber/cc has been proposed. This report and recommendations are not strictly keyed to the present or proposed law. ~~Asbestos is a carcinogen and therefore exposure should be reduced as low as possible with the measurements of fibers only as a guideline.~~ Specific examples will be cited below. However, the following recommendations should be applied throughout the plant.

A. Posting

All locations where asbestos may be released into the air should be posted with signs which say:

Asbestos
Dust Hazard
Avoid Breathing Dust
Wear Assigned Protective
Equipment.
Do Not Remain in Area Unless
Your Work Requires It.
Breathing Asbestos Dust May
Cause Lung Disease or Cancer

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At present signs to this effect are found in few locations. They should be present at the storage, pick-up and mixer loading stations in the chemical plant where asbestos is used as well as many locations in the Friction Products Building.

B. Containers

All containers for asbestos, intermediate materials, asbestos-contaminated clothing or asbestos-containing scrap should be either covered or exhausted and should be labeled. This was generally not done in this plant.

C. Ventilation Indicators

All operations with local exhaust ventilation should have an indicator visible to the operator, which shows that ventilation equipment is performing adequately. Where feasible there should be an interlock which will prevent operation of equipment without ventilation. This should be a high priority for bipel presses, grinders and saws.

D. Housekeeping

In general housekeeping needed improvement, with accumulations of fallout dust and spillage on the Lodige mixer platform, the bipel press area, the grinder areas, the hammer mill platform, and at a number of other locations.

This matter was mentioned in both Corporation, State of Michigan and previous UAW industrial hygiene reports.

The local union stated repeatedly, and was not contradicted by local management, that extra manpower had been applied to clean up in the previous days.

The local union safety and health representative, and the plant safety supervisor should together, objectively and cooperatively determine the frequency and nature of cleaning needed to attain a satisfactory level of cleanliness. Sufficient manpower should then be applied to this task.

E. Cleaning Methods

Vacuum cleaners were present at many work stations. Quite correctly the exhaust outlets were connected to the ventilation ducts to prevent recirculation of air into the workroom.

"Squeegees" rather than brooms were supplied for cleaning floors. This is equivalent to dry sweeping, whatever implement is used, and should be banned. Floors should

be wet down thoroughly before squeegee are used to sweep asbestos-containing dust.

F. Work Clothing

Work clothing was said to be provided only for weigh-up operators. This program should be modified as follows:

1. The Company should provide clothing at no cost, for all employees exposed to airborne asbestos. Use of this clothing should be ~~mandatory~~. At present the Company feels that they are required to provide clothing only if exposure is above the TLV.
2. Work clothing and street clothing ~~shall~~ not be stored in the same locker.
3. No work clothing shall be taken home.
4. Employees shall shower at the end of their shift.

G. Monitoring Observations

1. The local union ~~safety~~ representative should be informed in advance of visits and be ~~allowed~~ to accompany corporate safety and health professionals on all measurements of airborne asbestos. This was said not to be done at present for visits by corporate hygiene staff.
2. The local union safety representative should receive a copy of all notifications to individual employees of ~~any~~ exposure.
3. The letter informing employees of over-exposure, required by law, should contain the numerical result (number of fibers per cc) and should point out that such exposure exceeded allowable limits.

H. Receiving of Asbestos Shipments

It was stated that from time to time shipments of materials would arrive with broken or spilled bags of asbestos. If it has not already been done, a program to control this hazardous situation should be developed to include:

1. ~~Shippers~~ should supply asbestos in bags which have an individual ~~hazardous waste~~ wrap. Some asbestos was not in such wrapping.
2. A ~~procedure~~ for ~~disposing of~~ ~~spilled~~ ~~asbestos~~ should be ~~developed~~. This procedure should include: ~~limiting access to the area~~, ~~use of respirators~~, ~~methods and~~ ~~equipment~~.

II. Friction Products Building

A. Weigh-Up Station

1. ~~Containers~~ for ~~wet~~ ~~bags~~ should be ~~covered~~ or ~~sealed~~ and ~~containers~~ being contaminated with asbestos.
2. ~~Indicators~~ on the ~~exterior~~ ~~enclosure~~ should ~~show~~ ~~that~~ ~~the~~ ~~ventilation~~ ~~system~~ ~~is~~ ~~on~~ and the ~~blower~~ ~~is~~ ~~open~~.
3. The carts ~~should~~ ~~be~~ ~~provided~~ ~~with~~ ~~covers~~ ~~for~~ ~~transport~~ ~~and~~ ~~while~~ ~~waiting~~ ~~to~~ ~~be~~ ~~loaded~~.

B. Lodge Mixers

1. #4 Lodge mixer was used for a dry mix for disc brake pad manufacture. The other mixers were used for wet mixes. The #4 mixer was said to routinely leak visible dust during operation. The operation was run on third shift and could not be demonstrated during this visit. However the accumulation of dust in the vicinity of the mixer on the mezzanine and fallout on more distant surfaces indicated the dust escape was excessive. The #4 mixer should be modified or repaired so that no visible dust leaks occur. The Company should prepare

*with ...
...
...*

2. Small amounts of dust were seen to escape as carts were raised to load mixers. This dust escape should be prevented.
3. Housekeeping on the mixer mezzanine should be improved. Dry use of squeegees should be stopped, and vacuum or wet cleaning methods substituted.
4. Visible dust had accumulated on raised surfaces and duct work in the extruder room, possibly as a result of escapes from #4 Lodge mixer. These accumulations should be prevented.

C. Bipel Press

This operation should be modified to prevent or reduce airborne asbestos exposure. There are ~~asbestos~~ *asbestos* At present, an asbestos-containing mixture is transported to the work station in a covered bin. It is then shoveled into a smaller, plastic bin at waist height at the work station -- directly in the operators' and shovelers' breathing zone. Hot press operators do the shoveling. Portions are then scooped out of the bin, weighed by hand at waist height and added to the press. Only the press is exhausted. Fiber counts were close to 2 fibers/cc at this location. This is probably the worst station for ~~continuous~~ exposure to asbestos which could be reduced by obvious small changes in process.

1. Shoveling or lifting plastic bins should only be done in an exhausted enclosed station.
2. The plastic bins should be covered or exhausted. The scale should be exhausted.
3. Bipel and hot press operators should especially be provided with protective clothing.

D. O. E. M. Grinders

At the time of the visit, the ventilation on #2 O. E. M. grinder cut off during operation, resulting in a very large escape of asbestos-containing dust. The Company representatives agreed that the process should not be run without ventilation.

*Put up
an indicator
light when
bag house is*

930 Fri

The Company said the problem was that the baghouse on the ventilation system was shaking down, which had cut off air flow to the grinder. The Union said that the breakdown of ventilation on the #2 O. L. M. grinder was a repeated problem.

1. The grinders should be electrically interlocked with the ventilation system, so that the operation cannot be performed if ventilation is down. At present, personnel, including supervision, should be instructed not to run the grinders if ventilation is not functioning.
2. Plant engineering should investigate this problem and furnish a written report to the safety and health representative as to the cause of the breakdown, the method of correction and a date of correction.
3. The operators' noise exposure should be determined.

E. Saw Area

1. Fine dust fallout on many surfaces was evidence of airborne asbestos escape and inadequate housekeeping.
2. Many open barrels of asbestos-containing scrap were present in this area. These should be provided with covers.
3. The operators' noise exposure should be determined.

F. Hammermill Mezzanine

1. Duct work on the #1 hammermill was leaking dust. This was scheduled to be repaired.
2. Dust accumulations on the floor and other surfaces should be prevented.

G. Air Cleaning Equipment

1. One of the screw conveyors from the baghouse to the disposal container was leaking asbestos-containing dust. This should be repaired and preventive maintenance should be applied.

2. Fallout from the above leak into a finished product storage area should be vacuumed more aggressively.
3. The baghouse on the roof was visibly leaking dust into the outside area. It should be repaired.
4. Final disposal of dust from the dust collector system was enclosed and, a proper operation, should give no dust exposure.
5. Disposal of asbestos-containing material such as bags and perhaps scrap was by an ordinary trash compactor. Since these materials were dry and were not in closed containers, there was potential for release of airborne asbestos. The process should be changed so that no asbestos is released into the outside air.

III. Chemical Plant

A. Downtown Weigh-Up Station

Asbestos is regularly weighed up at this location a small part of the time. The area should be posted for asbestos exposure. The local union and plant safety representative should observe this procedure to determine if airborne asbestos exposure is possible, and if so, an air sample should be taken.

B. Storage Areas

A few broken bags of asbestos were found. These were not wrapped in plastic. The solution to this problem was discussed in I., H.

C. Mezzanine Weigh-Up Station

1. Provision for vacuum or wet cleaning should be made.
2. The area should be posted for asbestos exposure.

D. Mixers

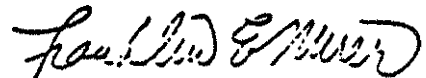
1. The hood at the loading point on the #2 Roadco mixer should be repaired.

2. Housekeeping on the #2 Readco mixer platform should be improved.
3. All mixers (Readco and #4 and #5 Churn) should be posted for asbestos exposure and provisions for wet or vacuum cleaning should be made.

IV. Summary

The Company position on many recommendations made verbally was that they were doing all that the law required, especially with respect to posting, closed containers, work clothing and locker room facilities. While this plant is generally in good shape, ~~in some areas asbestos is not~~ being treated with enough respect for its cancer-causing properties. The above recommendations would be feasible steps in further reducing this very serious health threat.

Faternally,



Franklin E. Miler, Ph. D.
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UAW Social Security Department

FEM/sm
opeiu42

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