

**PLAINTIFF'S
EXHIBIT**

CHR-89

File Code

Date

November 7, 1978

Name & Department

Division

Plant/Office

CIMS Number

C. Sprague

Personnel Manager

GMD

Detroit Forge

& Axle

440-00-C

Name & Department

Division

Plant Office

CIMS Number

P. Gendernalik

Industrial Hygiene

Employee & Chrysler
Indus. Relat. Center

417-05-1

cc: UAW HEALTH INSPECTION - ELDON AVE. AXLE PLANT

On October 17, 1978 an industrial hygiene inspection was conducted at the Eldon Axle Plant by Dan MacLeod, UAW Industrial Hygiene Consultant. Accompanying Mr. MacLeod during this inspection were the following personnel:

W. Waller - UAW International Representative, Region I
W. Cain - UAW Local 961 President
B. Solomon - UAW Local 961 Vice President
R. Smith - UAW Local 961 Recording Secretary
W. Sparks - UAW Local 961 Health and Safety Representative
L. Fields - UAW Local 961 Committeeman

L. P. Gendernalik - Corporate Industrial Hygiene
J. J. Palmer - Eldon Axle Labor Relations Supervisor
F. M. Borawski - Eldon Axle Safety Administrator

As a result of this inspection a report was issued by Mr. MacLeod detailing his observations and recommendations for corrective action. Presented herewith are comments by Corporate Industrial Hygiene regarding certain of these recommendations, in the same order contained in the MacLeod report:

A. Asbestos Brake Shoe Grinding

1. Pelletizer - Although we concur with the recommendations that visible leaks from the pelletizer (and dust collector) should be minimized, it should be noted that air samples obtained on October 18, 1978 showed no measurable exposure (less than 0.1 fibers per cubic centimeter of air) to any employee in the area as a result of the dust leaking from the hopper above the pelletizer (see attached data sheet). Nevertheless, it should also be noted that the pelletizer operator was exposed to measurable concentrations of asbestos dust inside the dust collector enclosure while he attempted to break loose the asbestos dust which had compacted within the dust collector hopper, to allow the dust to flow into the screw conveyor. Although the pelletizer operator's time-weighted average exposure was well below the allowable limits, (approx. 0.2 fibers per cc) this exposure resulted from the same situation which

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Re: UAW Health Inspection - Eldon Ave. Axle Plant

requires the exhaust system to be shut down in order to fill the pelletizer hopper, and which results in the release of dust from the pelletizer hopper. Therefore we recommend that an engineering study be made to improve the transfer of dust from the dust collector to the pelletizer, in order to prevent these occurrences. Corporate Industrial Hygiene, at your request, will assist the engineering functions in determining the cause and solution to this situation.

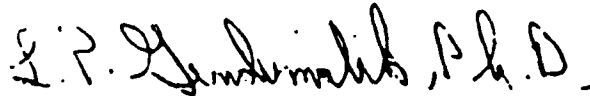
2. Preventive Maintenance - Industrial Hygiene has no comment.
3. Housekeeping
 - a) OSHA regulations prohibit brooms and shovels for cleanup of asbestos dust spills. We concur with the need to use vacuum equipment for all such housekeeping.
 - b) While we concur with the need to keep all surfaces vacuumed clean of asbestos dust where these surfaces are subject to activity which could re-suspend the asbestos dust, we feel that cleaning other surfaces not subject to such activity, such as the superstructure, would result only in a risk of exposure to the personnel doing the cleaning which is unnecessary at this time, in view of our observation that the dust in the superstructure is minimal, and is being held in place by a film of oil on the accumulations. If it becomes necessary in the future to clean these areas, as for painting, etc., it will be necessary to take all proper precautions to minimize the exposure not only of the employees directly involved but also of any other employees in the area.
 - c) and d) We concur with the need to facilitate continued cleaning of any asbestos dust accumulations and to seek out and correct the source of any such accumulation.
4. Asbestos Removal - We concur with the need to temporarily store unpelletized asbestos dust containers in a location where they will not be subject to damage, and recognize that the plant is already doing this.
5. Worker Education - Industrial Hygiene has no comment.

R. C. Sprague
November 7, 1978
Page 3

Re: UAW Health Inspection - Eldon Ave. Axle Plant

B. Other Conditions:

1. Battery Charging Area - We concur with the recommendations regarding the emergency shower. We feel that the concentration of airborne sulfuric acid mist in this area is minimal, and should remain so as long as proper procedures are followed in the battery charging area. Therefore we feel the need to provide additional exhaust ventilation in this area is minimal.
2. Machining Operations - Proper control of oil mist where synthetic coolants or soluble oil are involved can be achieved without installation of exhaust ventilation in many cases, by providing enclosing splash guards and by providing continuous centrifugal separators on each central coolant system to minimize the tramp oil and particulate contamination of the synthetic coolant. Together with proper laboratory procedures to monitor and control the pH and bacterial levels of the coolants, these measures will actually result in cost savings as a result of increased coolant life.
3. Automatic Press Noise - The feasibility of controlling noise generated by automatic presses cannot be generalized, and must be determined for each specific situation. We recommend that D. L. Heller, USAMG Noise Control Specialist, be contacted to assist in feasibility studies for controlling the noise from these presses.
4. Miscellaneous - Industrial Hygiene has no comment.


L. P. Gendernalik, Ph.D.
Senior Industrial Hygienist

hm
Attachment

cc: F. M. Borawski	W. M. O'Brien
F. A. Burnett	J. J. Palmer
J. D. Clifford	W. L. Pardonnet
D. L. Heller	J. M. Penberthy
N. McCallum	L. W. Perry
R. H. Miller	G. A. Sattelmeier
T. W. Miner	A. P. Szedlus
E. B. Nelson	R. W. Vorhees, Jr.

Data Sheet
Eldon Ave. Axle Plant
October, 1978

Asbestos, fibers (>5µ)/cc

Permissible Exposure Level, time-weighted average 2.0

Location

Department 78:

- 1) Area sample, Bay T-16, approximately
30 ft. east of pelletizer, during
filling of pelletizer hopper < 0.1
- 2) Area sample, same location, during
normal production operations < 0.1
- 3) Personal sample, pelletizer operator,
while inside dust collector
enclosure attempting to break loose
compacted asbestos dust in dust
collector hopper
(S. Calvin, SS#436-16-4723) 2.0*
- 4) Personal sample, pelletizer operator,
during normal production operations 0.1*

*Time-weighted average exposure
approximately 0.2 fibers/cc.

Asbestos dust samples were collected on cellulose ester filters and
analyzed by optical microscopy techniques.