

These are minimum requirements of the OSHA Asbestos Standard. To ensure compliance with this legal standard, a copy of OSHA Standard 1910.1001 has been provided in Exhibit 4 of the Appendix to assist you with compliance.

IH 89-3 VAPOR DEGREASER MAINTENANCE/INSPECTION PROGRAM: To ensure that all vapor degreasers are maintained in proper operating condition, a formal maintenance/inspection program should be developed and implemented. Scheduled inspections/maintenance items should include temperature controllers, condensation coils, and slot ventilation systems, if provided. These controls are essential in regulating and preventing degreaser solvent vapor from entering the operator's breathing zone. Records should be kept to document all vapor degreaser maintenance and inspection activities. Also, written procedures should be established regarding the cleaning and use of these vapor degreasers during normal work operations.

TECHNICAL DISCUSSION

I. Asbestos Sampling:

Air sampling was conducted in the Brake Department during typical brake remanufacturing operation. A personal sampling strategy was used during this industrial hygiene evaluation.

During personal sampling, both the pump and collecting medium are attached directly to the workers to sample the air to which they are exposed during the typical workday. This is the preferred method since it takes into consideration those times during the workday when employees are away from the areas of actual exposure.

The sampling apparatus consisted of battery powered air sampling pumps which draw air through a collecting medium at a predetermined flow rate. The flow rate was monitored by means of a rotameter calibrated prior to use against a primary standard mass flow meter. An open-faced, 25mm millipore filter was used to collect airborne fibers.

Details of sampling locations and sampling equipment are given in the first five Industrial Hygiene Survey Data Sheets contained in Exhibit 1 of the Appendix. Also provided in Exhibit 2 of the Appendix are two Industrial Hygiene Analysis Reports/Extension Sheets which present analytical data and test results.

The analytical method used by The Travelers Laboratory to determine fiber concentration was Phase Contrast Microscopy. This method is consistent with NIOSH 7400 Standards. The NIOSH 7400 method does not distinguish between fiber types