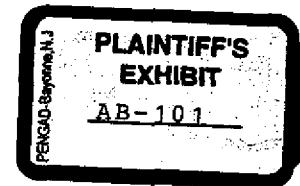


Mr. J. S. Holtaway

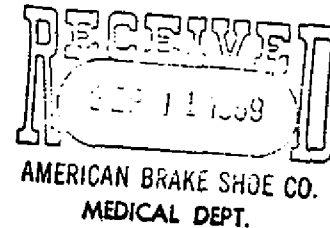
AMERICAN BRAKE SHOE COMPANY
AMERICAN BRAKEBLOK DIVISION
WINCHESTER, VIRGINIA



September 10, 1959

Mr. D. K. Rennie
Troy Office

Dear Don:



With regard to your letter of August 18, 1959, on the matter of Liberty Mutual's Industrial Hygiene Survey, conducted June 25 and 26, 1959, we wish to offer the following.

Upon receipt of the report, Messrs. C.B. Mallory, J.W. Riley, C.L. Curtis and the writer, made a complete analysis of same. Although we felt that we were aware of exact locations as described in the report, there were some areas we questioned and we elected to withhold any comments until after such a time as Mr. Charles Cole, Liberty representative, visited us again. Mr. Cole was here on Friday, September 4, 1959.

Airborne Lead (Page 3)
Conclusions

Compounding

- 1.) The weighing of certain powders at the south end of the dry mix powder bins indicated high lead concentration (4.33 Milligrams per cubic meter). Observation of this operation indicated the following:
 - (a) Operation is being performed several feet away from the exhaust system. This exhaust was installed after our Medical Department survey of November 5-8, 1957.
 - (b) Certain new materials are being weighed and there are not sufficient storage bins in regular line to accomodate them.

Action Taken

- (a) Move weighing operation back under hood in order that proper advantage may be taken of exhaust system.
- (b) Relocate exhaust hood in order to use to better advantage. On this item Shop Requisition #22015 has been issued.

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- 2.) The dumping of mix into buggy at the bottom of the ribbon mixers on the dry line results in "fines" not being contained by the dust control system.

Action Taken

Shop requisition #22016 has been issued to: (a) enclose the Rapid Standards Conveyor - (b) to provide a back on the hood on #2 line - (c) to rework the hood on #1 line.

- 3.) Borderline health hazard during dumping from blender to #1 Hammermill may exist.

Action Taken

Shop requisition #22017 has been issued to cover a velocity check on the exhaust system here. It is possible we may have to throttle back the blast gates mentioned in para. #2 to provide more air here.

- 4.) No comments - based on their comments.

Rolling

- 5.) Minimal concentrations of airborne lead exist at rolling machines except backing machine #6.

- (a) It is apparent that several conditions exist in the fume hood system, due to "poor" maintenance. This is not entirely the fault of poor workmanship but more from the absence of work performed on the equipment.

Action taken

Shop requisition #22020 has been issued to:

- (a) Check the fan for RPM's and speed up if necessary.
- (b) Relocate several hoods and "fasten with a purpose".
- (c) Secure "compressed air" signs properly.
- (d) Repair machine hopper before a complete new one is required.

Strip Finishing

- 6.) No comments - Everything seems to be in order.
- 7.) Close surveillance of exhaust system where higher lead concentrations existed (0.1 milligrams) - Automatic Chamfer #2 - back grinder #3 and exhaust of Torit Collector on automatic strip grinder.

Action Taken

Shop requisition #20221 has been issued to:

- (a) Rebalance dust collector system #1.
- (b) Pipe Torit Collector to the outside.

It must be noted that when dust collector #13 is installed, an additional 4,000 CFM's will be released for use in this department.

Frakeblok (Blok Department)

- 9.) No comments - Everything apparently in order.
- 10.) No comments - Everything apparently in order.

NOTE: By taking action as indicated above, it is felt we will reduce and in some instances eliminate those excessive counts as shown on pages 8 & 9 & 10 of the survey.

Airborne Asbestos (Page #11)

Conclusions

- 1.) Borderline health hazard exists at weigh and dumping stations in the wet line.

Action Taken

Shop requisition #22019 has been issued for:

- (a) New rubber gaskets on flanges of hopper.
- (b) New dust "box skirts" be installed in place of battered and crushed ones now in use.

- 2.) Weighing and blender charging - excessive airborne asbestos.

Action Taken

Shop requisition #22023 has been issued to cover. Improve design of hoods, rebalance system and relocation, if necessary.

- 3.) Covered above.

NOTE: The above action should reduce and/or eliminate high counts shown on page 14 of report.

Methyl Ethyl Ketone Vapor in Air (Page #15)

PC Department

- 1.) No comment.

- 2.) Exposure of operator to applicator machine - borderline health hazard.

Action Taken

- (a) An exhaust system as described in "Control" should be provided. A price for same has been requested from Turner. Covered by MR #3371.
- (b) Shop requisition #22024 has been issued to set large roof fan to bring air into room instead of pulling out - the latter being operator's desire.

Block Cement Compounding

3.) No comments.

4.) No comments.

NOTE: High counts as noted on page 17 should be relieved and/or eliminated as result of above action.

Hearing Conservation Survey

No comments.

Ventilation Study

This report indicates that our present system could stand some repairs and revamping. Certain cases exist where the original hood was taken off and never remodeled or replaced.

Mr. Wagner's report indicates that we should redesign our entrance fittings on the majority of our equipment. To do so will be very costly and time consuming and will not in the end solve many problems. We have to assume that the individual workman will still "doctor" or batter the ductwork as they have done in the past. Our control over this will have to be improved upon by going to disciplinary action, if necessary.

Mr. Cole was advised that after we have completed all action of the discussed items we would like him to recheck the areas concerned and again offer their comments.

Any comments you may have as to our action on any of these items will be appreciated.

W.H.Baker/pr


Safety Director.

cc: F.E.Taylor
J.Soviak
J.T. Gresh
G.A.Riley
L.E.Hamlin J.S.Holtaway

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