

UNITED STATES STEEL CORPORATION

TO K. M. Morse
Director
Industrial Hygiene

DATE September 27, 1965

FROM W. H. Baumann
District Industrial
Hygiene Engineer
Central District

SUBJECT Answer to Report On Industrial
Hygiene, Released by State Labor
Department - Gary Works

PLAINTIFF'S EXHIBIT

USX-1081

TIME: September 22 & 23, 1965

PLACE: Gary Works

ATTENDANCE:

Hobart Butler, Indiana Labor Commissioner
Fred J. Keppler, Chief, Indiana Industrial Hygiene
Dan Farrell, Safety, USS
H. S. Spitz, Gary Works, USS
W. T. McLean, Gary Works, USS
W. H. Baumann, Industrial Hygiene, USS

Since reception of the Industrial Hygiene Report which was submitted by the Indiana Labor Department, many persons at Gary Works assisted in preparation of replies to the twenty-eight items cited for improvement. W. T. McLean and H. S. Spitz made the major contribution at least in assembling and arranging the Gary Report.

A copy of the rough draft of this report is enclosed. Recommendations are categorized by Division. Each Division Superintendent was requested to comment on those items pertinent to his Division. In some instances compliance involved issuance of personnel respiratory protection or moderate investment for control of contamination. Mr. Spitz gave his approval to these items. In "controversial" orders, where no apparent solution was available, Division Superintendents were asked to comment. Some of the orders, at least replies to them, were permitted additional time for study purposes.

A summarization of the current status of each order is as follows:

1. Orders 1, 6, 19 and 20 are in the process of compliance.
2. Orders 2, 3 and 4 were never resolved. The equipment - all mobile - which is involved was inspected and rode by State representatives. Keppler stated that the contamination problems associated with the operation of these facilities were not severe. This statement, as well as the citation, was based on visual inspection and sensory perception. The possibility of studying these

operations relative to the relationship of the operator to his activities was discussed. In order to isolate the man within a conditioned enclosure, the operation of this equipment would have to be redesigned which would necessitate almost complete automation. This conceivably could be accomplished through specifications of new equipment. Improvements could be made on present equipment. However, any modifications on equipment or operations should be studied on a unit basis. The major difficulty to this approach is that we have no baselines for comparison. Actually, the State never did establish whether or not a health problem did exist at any operation which was cited.

3. Order 5 is in process of compliance.
4. Order 7 - Drum feeders are being replaced as scheduled. Coke screening can be evaluated by air analysis to determine whether or not dust control is needed.
5. Orders 8 and 9 are scheduled for completion. It was generally agreed that pug mills (#9) will be difficult if not impractical to maintain and operate especially in the cold weather.
6. Orders 10, 11, and 12 are in need of additional study. Ventilation should be studied as well as sources of CO emission. Recording chart for the eight-point sampling system definitely shows that excessive levels of CO are found intermittently at different locations. I believe that ultimately the proof of exposure, as to degree, can be documented through blood studies. For this reason we have requested that the medical technician develop the S-R procedure for the microgasometric analysis of COHb. Because of the vastness of these buildings involving so few people, it is impossible to predict CO exposure based on chart recordings.
7. Orders 18 and 26 have been completed.
8. Orders 13 and 14 were discussed and the areas involved were inspected. It was suggested that a "white cap" installation might prove practical for the tractor operator. Keppler asked for the free silica analysis of the slag. Respiratory equipment offer the only practical solution for #14. This operation is performed outdoors, and exposure is contingent to a large measure upon weather conditions. Furthermore, the application of water is restricted in cold weather.
9. Orders 15 and 16 have been completed.

10. Order 17 needs clarification to determine whether or not the CO and dust levels are significant from a health viewpoint.
11. Orders 21, 22 and 23 require no further elaboration.
12. Order 27 requires additional study from us. Spray painting of mobile equipment, engines, cars, etc. may be done in an isolated area complete with ventilation. Presently this work is done in several large buildings with no specific provisions for protecting employees not engaged in spray painting.
13. Order 28 has been completed.
14. Orders 24 and 25 were discussed very briefly. Apparently, present compliance together with several new installations satisfy State requirements.

Dr. Woodward was with us when the discussion of blood lead analysis was presented. It was agreed that Mr. Keppler would send about fifty vacuum tubes. Plant medical doctors would procure the blood specimens from employees engaged in the making of lead bearing steels and allied operations involving processing of these steels. The men would be selected at random. However, the responsibility of selecting these employees was never delegated.

The blood specimens are to be submitted to the State Industrial Hygiene Laboratory for analysis. Mr. Keppler suggested that the remaining blood from each specimen be submitted to Mr. Bumsted for analysis. The duplicate blood lead analysis from each laboratory would be reported to the plant. It is Mr. Keppler's contention that blood leads represent the most reliable measure of the lead hazard potential and its effect upon the individual.

No date was mentioned relative to initiation of this program. Frequency of testing and such other details as would be involved in developing such a biological testing program were not discussed.

The other phase of the report which involves "detailed" study of certain operations and process as well as specific conditions was discussed briefly. These were the items designated by letters a, b, c, etc. Mr. Keppler stated that they would like to begin this phase in about two months. No definite schedule was established other than we would be notified in sufficient time to be mutually convenient. He constantly stressed that their backlog of work is too great for their small staff. Mr. Spitz did state that in his informal meetings with Mr. Butler, the State would accept any air analysis data which was reported by us.

Following the ensuing meetings and inspections, my personal observations were that Mr. Butler has very little to say about industrial hygiene matters. He seems to go off on tangents to bring in matters relating to safety. Keppler seldom contributes anything of a positive nature in the solution of any of the problems. Of course, this is mainly attributable to the fact that he knows practically

nothing about steel mill operations. He might improve his image if he sincerely tried to understand the scope of our operations as well as our competitors. Above all, he continuously avoids discussion of using threshold limit values as a means of evaluating environmental health problems.

We all recognize that the employee today is much more aware of the environment in which he works. As a result, he is constantly putting pressure on management to improve it. Keppler's approach is that it is easier for him to get things accomplished as a representative of a State Agency than it is for those who work within the framework of management. Apparently, at least in Indiana, industrial hygiene, as enforced by the State Labor Department, is becoming somewhat of a political football. Since we have many local problems by way of air and stream pollution, we are hoping to appease State Agencies by complying in areas such as industrial hygiene.


W. H. Baumann

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Enclosure