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Gidley RE OSHA Visit to Plant



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MEMO TO FILE

At the request of C. B. Mallory, the Plant Manager, I went to Winchester-FPG on Friday, June 6, 1975 to meet Harold Pauly, the OSHA Industrial Hygienist from Richmond, Virginia while he was completing the plant survey and to be available for the close-out interview.

I spent the majority of the day with Pauly while he collected the last five of his samples, all from Strip Finishing. I found him to be a congenial individual, not prone to crusading or officiousness. Pauly has about 10 years' experience in Industrial Hygiene with a previous background in Geology.

Their methods of sampling correspond to ours in that they take several short term samples over an extended time period at each operation, if filter loading is likely. The main difference is that they attempt to sample for a full shift whereas we limit our sampling to 2, 2½, or 3 hours. He does not remain in constant attendance at the sampling sites. Bob Brown stated that on Thursday, June 5, 1975, Pauly had given samplers to him and Charles Curtis to place on some of the employees. They apparently also turned on the pumps and recorded the time. This is not a usual practice for Industrial Hygienists, and is open to criticism although none was extended.

During the course of our conversation, Pauly indicated that the asbestos samples would also be checked for lead. This could be significant as there are some locations including Compounding, Blok Finish, and Blok Preform which show chronic excursions which parallel elevated asbestos levels.

In relation to asbestos exposures, he also indicated that they might request the release of some of our chest X-rays for inspection. I assume that this would be for long term employees in high exposure areas.

He made few comments regarding our own Industrial Hygiene surveys except to say that they appeared to be thorough and showed asbestos exposures at some locations. He was unaware however, that elevated levels existed at Blok Finish and Disc Brake Manufacture and had not sampled there. I didn't volunteer the information. However, he did take pictures of all areas in the plant including the above locations, but most particularly at his sampling sites.

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His comments were few at the close-out. He indicated that it would take 3 or 4 weeks for the asbestos samples to be analyzed by the OSHA laboratory in Salt Lake City, Utah, and the report would be forthcoming shortly thereafter. In response to a question from Charles Curtis, he indicated that each excursion above the five fiber limit would constitute a serious violation subject to a fine of \$1,000.00. Good intentions or visible efforts to reduce exposure could aid in reducing penalties, but he was not specific on this point.

Noise levels were also measured in the plant, and Pauly indicated that use of hearing protective devices was good in most areas. He said that OSHA is at the mercy of industry as far as engineering controls are concerned. As long as good effort is made to implement technically feasible controls, OSHA must accept the results of such investigation. Where engineering controls are not feasible, hearing protective devices will be acceptable on a permanent basis. They are asking for compliance plans, but the time limits are generous. Pauly spoke of a five year program with extensions when needed.

OSHA within the State of Virginia is setting up local offices with the area office in Richmond, Virginia. The local OSHA office covering Winchester is to be established in Falls Church.



M. David Gidley

MDG:ejt