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Memorandum

Bendix

Bendix Friction Materials Division
Green Island, New York

Allied Signal

Date: February 26, 1987

To: S. Scott

From: C. Larson

Subject: Asbestos Program - Compression Mold Area - February 25, 1987

A walk through the compression mold area with J. Skidmore, and J. Herman (Sector) resulted in the following observations:

° Many work stations with vacuum capability were not as clean as one would expect for several reasons:

1. Vacuum hoses did not have attachments which would substantially increase cleaning efficiency of the vacuum system.

2. Administrative procedures, supervision and enforcement of the administrative procedures are not as effective as they should be to enforce cleaning time that is being provided to the operators.

3. In order to achieve cleaner work stations, the operators have to be provided the equipment to do so. Someone has to initiate and follow through on obtaining the necessary cleaning equipment, attachments etc. in order to maintain work station cleanliness.

4. Various high vacuum hoses were left open to atmosphere thereby reducing operating efficiency at other high vacuum locations.

° Visible accumulations were evident but, some possibly could be attributable to not having proper cleaning equipment, leaks in duct work (resulting in particulate "raining" upon equipment), and inefficient dust collector pick-up lines on various pieces of equipment. Operator work practice could be improved to reduce fugitive emissions from the work station, thereby, reducing employee exposure.

° There was various pieces of equipment and work stations which were without vacuum capability and had asbestos accumulations that were quite old. Book truck frames, for example, had substantial build ups that have to be removed. Book truck storage areas showed recent evidence of being vacuumed, but could be

WCK017297

improved if the vacuum hoses had proper attachments to enhance vacuum efficiency. There does not appear to be someone responsible for these "no man's" areas. This has to be assigned to someone to insure proper cleaning of these areas.

- Dust collector duct-work leaked in several areas near the drills. Bolted duct-work seams should be tightened or possibly the installation of gaskets would insure duct work integrity. Some of the equipment visible accumulations may be the result of ducts leaking, therefore, investigation of visible accumulations should include duct-work integrity inspections.

- Just about every drill we visited had dust collector pick-up line problems such as improper placement, damaged pick-up nozzles, insufficient hooding around equipment and pick-up lines which were left open to atmosphere but not being utilized because the specific hood was not required. These are obvious dust collector maintenance problems and should be part of a continuing preventative maintenance program for the dust collectors. It is my opinion that failure to maintain dust collector pick-ups at the machines could be viewed by an OSHA inspector as a "willful violation" resulting in grave consequences. Based upon this cursory inspection, it is strongly recommended that all work stations are inspected to insure that all pick-up lines etc. are in proper operating condition. This should be a priority because it is quite possible that OSHA could conduct a facility inspection in the near future.

- There were obvious signs that there was insufficient vacuum cleaning capability. Since the present high-vacuum system is fully extended, the purchase of portable vacuum cleaners is recommended to provide the additional vacuum capability at the work stations where high vacuum lines are not available. Work stations without vacuum capability were obviously not as clean as the work stations with vacuum capability.

Recommendations:

1. Purchase the necessary vacuum hose attachments in order to enhance cleaning efficiency.
2. Review administrative procedures to assure that operators are cleaning their work stations as required.
3. Inspect all dust collector duct-work and repair all leaks (ie. gasket installation at flanges if needed)
4. Inspect all dust collector pick-ups, review all pick-ups against equipment drawings, repair as needed and institute preventative maintenance programs for the equipment at the work station.

WCK017298

5. Purchase portable vacuums for work stations without vacuum capability and assign "no man's land" areas to insure cleaning of these areas.
6. Suggest weekly tour by management to insure that administrative procedures, housekeeping, and dust collector maintenance is being maintained at best management practices.
7. Since Troy and Cleveland are ranked no. 1 and no. 3 by EPA in asbestos risk assessment, I am quite sure that our two facilities will be high on the hit list by OSHA to conduct enforcement inspections. Based upon this insight, I strongly urge that routine maintenance, operating procedures and purchase of equipment be performed in order to insure proper "protection of the employee."

CRL:M CRL

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