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Inter Company Correspondence

From-Name & Department		Division	Date	
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Subject: MEETING - REVIEW OF F. MIRER REPORT AND CORPORATE INDUSTRIAL HYGIENE COMMENTS

Per our discussion, this letter will review the results of our meeting on Monday, April 19, 1976. Mr. Enders and I were happy to have the opportunity to meet with you and Mr. Glazier to discuss the comments and recommendations made by Mr. F. Mirer, Social Security Department, U.A.W., in his report of a visit to review asbestos exposure in the Chemical Division.

As you know, this plant location has made a considerable effort and expenditure of funds over the past several years to assure that we would meet the reduced OSHA Standard for Asbestos Exposure, (two (2) fibers/cc.), to be effective on July 1, 1976. The results of tests and inspections by OSHA, the Michigan State Department of Labor, Corporate Industrial Hygiene and our own Safety personnel over this period indicated these efforts have been successful, and we have been under this new standard for exposure limits for over two years.

With few exceptions, Mr. Mirer's recommendations and/or requests do not relate to items which represent deficiencies with respect to this forthcoming reduced standard, but rather to a recently proposed further reduction in the Asbestos Exposure Standard to .5 fibers/cc. It should be noted, this proposed further reduction in the exposure standard to .5 fibers/cc. has caused a great deal of controversy and concern throughout the asbestos and related manufacturing industries. First, there is considerable doubt and a lack of appropriate evidence to support the need for a standard this low from the standpoint of employee health and safety, and, secondly, more than a little question that the affected producers and manufacturers would be able to meet a standard at the .5 fibers/cc. level.

Considering these factors, it should be noted that the implementation of Mr. Mirer's recommendations/requests would have significant and serious economic implications at the Chemical Division, particularly in the absence of a .5 fibers/cc. standard, requiring similar changes elsewhere in the asbestos and friction material industries.

Our purpose in requesting a meeting with you and Mr. Glazier was to review Mr. Glazier's memo concerning Mr. Mirer's recommendations and requests, which have already become the subject of a number of grievances and demands by our Local Union. If your office did feel that specific items contained

...n Mr. Mirer's report represented deficiencies, or potential problems with respect to our compliance with the upcoming reduced standard to two (2) fibers/cc., it would, of course, be the Chemical Division's responsibility to take the action necessary to assure compliance with this standard by the July 1st, 1976, effective date. To the extent, however, the recommendations and requests by Mr. Mirer are not required to meet existing or the forthcoming two (2) fibers/cc. Asbestos Exposure Standard, or do not represent any other health hazard to our employees, our position would be they are negotiable local union demands, and be treated accordingly.

Following is a summary of the major points made by Mr. Mirer in his report and the response to these items, as discussed and agreed in our meeting:

1) Posting -

a. Language for any signs to be posted is specified in both the current and July 1st, 1976, Asbestos Exposure Standard. Any signs to be posted will use this language, without reference to lung disease or cancer, as proposed by Mr. Mirer.

b. Generally, we agreed that wide-spread or indiscriminate posting with respect to potential asbestos hazards tends to dilute and/or weaken the effectiveness of this action.

c. Based on both the current and upcoming reduced Standard to two (2) fibers/cc., posting is only required in areas in which employees may be exposed to asbestos at the "ceiling level (ten (10) fibers/cc.). Tests and air sample analysis by your office do not indicate that the locations identified by Mr. Mirer have this level of exposure. We will, however, review these areas, again, and make any additions required.

2) Containers -

a. It was recognized that covering containers of asbestos-containing material can be a costly measure with relatively little effect on overall asbestos exposures. Open containers of inert materials containing asbestos do not represent a health hazard, unless particles can become airborne. Since this is most likely to occur during loading and unloading operations (when the covers would be removed), the use of covers is questionable.

b. We will review those instances in which containers of material containing asbestos are moved about the plant, creating the possibility of airborne particles, and provide cover where needed.

3) Ventilation Indicators -

a. Ventilation indicators of whatever type can only advise the operator that the ventilation equipment is "on" or "operative." Whether or not the equipment is performing adequately can only be determined by trained personnel, using prescribed testing devices and air samples.

b. In most instances, the operators can determine, physically, whether or not ventilation equipment is "on" or "operative." This responsibility will be incorporated into existing job duties and employees will be instructed to check ventilation equipment for operation at the start of each shift. Inoperative equipment will be reported to Supervision and Maintenance, immediately.

c. At those locations where physical check is not easily accomplished, some type of indicator will be utilized, to alert Supervision and Maintenance to potential problems.

d. Because of redundant and "back-up" systems, the use of "interlocks" is not feasible at most locations, and the use of specific equipment without the primary ventilation source is not hazardous, particularly on a temporary basis.

4) Housekeeping -

a. Management agrees that good housekeeping is necessary to the effective and orderly conduct of all manufacturing operations, and has agreed to this in our current labor contract.

b. We agree the matter of janitorial manpower and scheduling is the responsibility of plant management.

5) Cleaning Methods -

a. After some discussion, we agreed that the "wet" methods recommended by Mr. Mirer are not practicable or effective for our operations.

b. "Squeegees" will be used to move asbestos-containing waste material and other debris, dirt and dust to the proximity of the existing network of vacuum cleaners for proper clean-up.

c. The Corporate Asbestos Review Guide will be revised to reflect this method for the Chemical Division.

6) Work Clothing -

a. Existing and forthcoming OSHA Standards require special clothing, such as coveralls, for any employee exposed to airborne concentrations of asbestos which exceed the ceiling level, (ten (10) fibers/cc.). Our current Corporate Standard provides for this clothing when employees are exposed to concentrations exceeding five (5) fibers/cc., and this is currently applied at this plant. Those employees at locations identified by Mr. Mirer, who are not now assigned coveralls and two (2) lockers, are not exposed to even two (2) fibers/cc. in most instances.

b. During the 1973 contract negotiations, management at the Chemical Division agreed to provide protective aprons for employees at many of the locations noted by Mr. Mirer. Few of these employees have requested work aprons during the past three years.

c. In order for coveralls to provide any protection from possible contaminations, they must be kept apart from employee street clothes and stored in separate lockers. New locker and shower facilities would have to be constructed at this plant to provide the necessary space for all Friction Products employees.

d. Existing test and air sample analysis data do not indicate a hazardous condition at these work locations, based on the current and forthcoming reduced exposure standards.

7) Monitoring Observations -

a. It is recognized that the local union Health and Safety Representative is notified when Corporate Industrial Hygiene enters the plant for survey purposes.

b. The current Health and Safety Memorandum of Understanding does not provide for the Representative to be excused from his job to monitor testing and sampling procedures, and this plant does not propose that this be changed.

c. The various tests and air samples are taken by trained, professional hygienists. We do not believe an untrained, non-professional, union-appointed representative can make any useful contribution to the testing and sampling procedures. The Union, of course, does have the right to request that specific areas, locations or job operations be sampled for potentially hazardous conditions, and to be informed of the results of these tests.

c. There is no agreement in the present Memorandum of Understanding to provide the local union safety representative with a copy of letters given to employees regarding over-exposures. We have, however, as a matter of practice, notified the Union of these letters and any over-exposure, and have allowed them to see them.

e. We are agreed that inclusion of the specific numerical results of air sample analysis in over-exposure letters would serve no useful purpose.

8) Friction Materials Building -

a. Weigh-up Station - We are agreed that waste bags be disposed of in sealed, impermeable containers.

b. Lodige Mixers - The housekeeping problem at this equipment was caused by a breakdown. Repair had already been scheduled, prior to Mr. Mirer's visit, and was accomplished shortly thereafter. We are in agreement that air sample results show that the dust which is seen to escape during loading of this equipment is composed, mainly, of non-asbestos particulate and is below current and forthcoming permissable levels.

c. Bipel Presses - We agree that improved administrative controls with respect to employee training and handling of asbestos-containing material is required at these locations. Previous air sample results have indicated that present engineering controls are adequate to minimize exposure. The recent assignment of new employees to some of these operations have caused some increased exposures in the most recent survey results.

We do not believe the use of plastic bins, filled at another work station, and covered or exhausted would make any significant change in what are already low exposures. Protective clothing is not required by current or forthcoming OSHA Standards for the exposures at these work stations.

d. O.E.M. Grinders - As you are aware, we have reason to believe that the apparent "malfunction" of ventilation equipment at this location during Mr. Mirer's visit was not "accidental". We do not believe an interlock is required at this location, since "shake-down" operations are not conducted with employees in the area. As we discussed, however, some type of warning light or indicator will be installed to advise employees when the air flow to the grinder is cut off, due to "shake-down" operations. The noise exposure

at this location has been measured and found within allowable limits. We agree that Plant Engineering will not provide written reports to the Health and Safety Representative.

e. Saw Area, Hammermill Mezzanine, Air Cleaning Equipment - The items noted by Mr. Mirer as in need of repair have been fixed, as previously scheduled. As noted above, open-barrels of asbestos-containing material do not present a health hazard. The scrap noted by Mr. Mirer in this area are large pieces of scrap brake lining material which present no potential for airborne asbestos particulate.

9) Chemical Products Building -

a. Downstairs Weigh-Up Station - Air samples have already been taken, regularly, over the past two years at this location, and exposures are minimum. Because of the relatively small asbestos usage in the Chemical Products area, time-weighted averages reduce exposures to very minimum levels.

b. Storage Areas - Efforts are being made to assure that all asbestos shipments are received in plastic bags, per Mr. Mirer's comment.

c. Mezzanine Weigh-Up Station - Provisions are being made for the use of a vacuum cleaner at this location.

d. Mixers - The hood at the loading point on the #2 Readco mixer has been repaired.

We do not feel the overall use and exposure to asbestos in the Chemical Building warrants the use of signs of the type which might be posted in certain areas of the Friction Products building.

In summary, it is recognized that our plant location is and has been in compliance with the requirements of the new OSHA Asbestos Exposure Standard to be effective on July 1, 1976. Except for the repair of specific equipment or other changes, as noted in the foregoing, none of Mr. Mirer's recommendations are required to enable this plant to meet the current or established future OSHA Standards.

RE & Grant

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/ph
cc: G. D. Benson
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APR 27 1976
INDUSTRIAL HYGIENE