



Johns-Manville

Internal Correspondence

To: ✓ L. I. Richards - Denison

Date: February 13, 1976

From: W. A. Sells

Copies: S. B. Gillespie, H. T. Brode-Denison, file/chrono

Subject: ASBESTOS STATIONS OVER 2.0F/cc
YOUR LETTER OF FEBRUARY 6, 1976

PLAINTIFF'S
EXHIBIT

JMMC-194

I am sure you are aware of the deadline for the reduction of 8-hour TWA exposures to asbestos fiber below 2.0F/cc by July 1, 1976. Your subject letter does not indicate a time schedule to meet this requirement. Specifically when do you propose to complete evaluation of modifications to the scrap feed chute? Also, what is your schedule for completion of the design of the bag opening station? When do you expect to resample these two locations in order to confirm dust levels?

Your prompt answers to the above questions will be appreciated. They are needed to confirm the Division's ability to meet these dust requirements on schedule.

/ma

*JSD -
Pls prepare answer also
set-up schedule w/ chart to
follow - need to keep on
front burner
Lark*

W. A. Sells, DHQ

February 6, 1976

L. I. Richards, Denison

S. B. Gillespie, DHQ

H. T. Brode

ASBESTOS STATIONS OVER 2.0 F/cc -
CRITERIA FOR CORRECTION

Denison has two stations over 2 F/cc, the Scrap Grinder Operator and the Willow Operator.

Scrap Grinder Operator

All of E. J. Mitchell's basic criteria have been met except providing mechanized scrap feeder to the grinder. Recent modifications to the scrap feed chute are being evaluated to determine if a mechanized feeder is needed.

Willow Operator

Two of E. J. Mitchell's criteria have not been met. The elimination of paper fibre bags is beyond plant control.

The design for modification of the fibre feed is being prepared to make possible the use of one bag opening position. Modification will be complete approximately 2 months after commencement of work.

LIR/is



Johns-Manville

Internal Correspondence

To: See Below

FEB 2 1976

Date: January 27, 1976

From: W. A. Sells

Copies: S. B. Gillespie, File/Chrono

Subject: ASBESTOS STATIONS OVER 2.0 F/cc
E. J. Mitchell's Letter of December 30, 1975

You were all forwarded copies of the subject letter recently.
I am sure you are well aware of the urgency of reducing the 8-hour
TWA exposures at these cited locations.

If you have not already done so, will you please advise me of
your current plans and schedules for the elimination of these
problem areas. A copy of this information should be sent to
Sam Gillespie here at DHQ. If the demands of these projects
will disrupt your current Six Months Operating Plan Schedule,
arrangements should be made with Sam for their modification.

Please have your current plans in my office by February 9, 1976.

/pe

TO: L. I. Richards - Denison
G. E. DeLong - Green Cove Springs
W. A. Ford - Long Beach
R. F. Henry - Manville
W. E. Volwiler - Stockton
J. W. Christopher - Waukegan

Johns-Manville

To: W. A. Sells

JAN 8 1976

Dec. 30, 1975

From: E. J. Mitchell

Copies: G. C. Eggleston, S. Lane

Subject: ASBESTOS STATIONS OVER 2.0 F/cc
CRITERIA FOR CORRECTION

Following is a listing of Pipe Division and IPD asbestos stations recorded as "over 2.0 F/cc" on the latest Industrial Hygiene Surveys. Survey dates are shown to the right of the plant name.

Denison - Pipe

Oct. 13-17, 1975

D-7WE Willow Feed Operator

D-8WE Scrap Grinder Operator

Green Cove Springs - Pipe

Sept. 29 - Oct 3, 1975

D-1T Willow Operator

D-6T Crosswalk over slurry trough

Long Beach - Pipe

Aug. 18-28, 1975

D-14WE General area - over #1 P.M. mixing trough

D-16F General area - inside enclosure under baghouse (finishing)

D-2M Skillsaw Operator -

D-1F U.C.L. Operator

Manville - Pipe

Apr. 23 - July 23, 1975

D-12W Willow Operator, #1 and #2 machine

RTN
original

*Johns-Manville - Will need
transmission on positive note
Also discuss the fact*

*I - want to see A-1c plants
(under work)
get info. for your
info. Will need to
specific plan to
correct these
stations.
6 mo. plan
to be
reviewed &
revised*

Stockton - Pipe

June 16 - July 3, 1975

D-9WE #4 Willow Operator

Waukegan - Pipe

May 1-30, 1975

D15-WE Willow Operator

D9-F DeWalt Saw (#3824)

D-15F Operator, large coupling lathe

D-25F Mold. Saw Booth Operator

D-41F Hawthorne Lathe - North side

D-22S Millwright

Billerica - IPD

W. B. Reitze report 9/22/75

D1-P Grinder Operator

D2-P Mixer Operator

D5A-P Press Utility Operator
Racking and un-racking by hoist

D6A-F Panel Saw Helper

D7-F Silica Treating Operator

D15-F Maintenance Worker

D17-F Packing Operator

Tilton - IPD

W. B. Reitze report 9/23/75

D-1T Beater Operator

D-8T Millboard Machine Operator

D-9T Millboard Take-off Operator

Waukegan - IPD

W. B. Reitze report 9/23/75

D6-MB	Millboard Saw Operator
D-1MP	Willow and Ross Mixer Operator
D-65	Unload Boxcar Fiber
D-4C	Operator of Adhesive Mixer

Under current OSHA regulations, July 1, 1976 is the deadline date for reducing 8-hr. TWA exposures to asbestos fibre below 2.0 F/cc. With but six (6) months to go, correction of those stations still above 2.0 F/cc should be given priority treatment.

At your request, I am submitting the following basic criteria for correction of those Pipe Division stations now above 2.0 F/cc.

1. Willow Operators

- a. Empty bag disposal inside discharge hood.
- b. Willow air used for hood ventilation.
- c. One (1), only, bag opening position on conveyor-type fibre feeders.
- d. Eliminate all "up-drafts" in working area.
- e. Immediate availability of vacuum clean-up equipment at each bag opening station.
- f. Pallet washing station for cleaning empty pallets.
- g. Elimination of paper fibre bags.
- h. Continuous audit of all fibre handling procedures, coupled with training and discipline as required.

2. Scrap Grinder Operators

- a. Eliminate "dump mining" operations where, and if, in use.
- b. Select and use only large size pieces of scrap at grinder. Do not contaminate with dust at finishing end.
- c. Eliminate dust feeding operations at scrap grinder where, and if, in use.

- d. Provide hood at scrap feeder with sufficient protection to eliminate adverse affect of cross-drafts. Provide additional ventilation air to insure dust capture velocities in working area. Eliminate all "up drafts" in working area.
- e. Provide mechanized scrap feeder to grinder, where not now installed.
evaluating changes to determine if feeder needed
- f. Continuous audit of all scrap handling procedures, coupled with training and discipline as required.

3. Crosswalks over Slurry Troughs

- a. Provide dust collection system at all leak points in fibre storage, handling, weighing, mixing and feeding system. This means every shaft seal, inspection door, clean-out, etc.
- b. Provide vacuum clean-up capability on an immediate availability basis.
- c. Increase ventilation air at wet mix box.
- d. Continuous audit of housekeeping and clean-up procedures, coupled with training and discipline as required.

4. Baghouse Dust Discharge Enclosures

- a. Eliminate use of open top container when, and if, in use.
- b. Eliminate use of containers which must be "re-positioned" to fill completely.
- c. Provide "standard" connectors (like Waukegan) between rotary valve and container.
- d. Provide "negative pressure" vent connection (like Waukegan) between dust collector and container.
- e. Provide dust collection system at all leak points (shaft seals, doors, transfer points, etc.).
- f. Continuous audit of housekeeping and clean-up procedures as well as material handling procedures, coupled with training and discipline as required.

5. Skill Saw Operator

Eliminate the operation.

6. U.C.L. Operator

- a. Provide all tool bars with airjet to operate only when hood is closed.
- b. Provide pallet washing station to insure only "clean" pallets are used for blanks.
- c. Provide vacuum clean-up system for immediate availability at each lathe.
- d. Provide down-draft, ventilated inspection table at each lathe.
- e. Continuous audit of clean-up and materials handling procedures, coupled with training and discipline as required.

7. DeWalt Saw Operator

Continuous audit of dust collection system operation and use. Provide training and discipline as required.

8. Pipe Lathe Line Operators

- a. Provide hoods, where not now installed.
 - b. Provide rubber wiper rings on each chuck.
 - c. Eliminate air blast cleaning after lathe.
 - d. Eliminate impact of pipe-against-pipe after lathe. Provide mechanical conveying.
 - e. Wash all pipe I.D.s.
 - f. Provide vacuum cleaning system at each lathe for immediate availability.
 - g. Continuous audit of clean-up and materials handling procedures, coupled with training and discipline as required.
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9. Millwright (Maintenance Personnel)

- a. Provide portable vacuum cleaning equipment to be used prior to start of maintenance work.
- b. Provide training in procedures to be followed (clean up job before starting work, leave job clean when finished, etc.).
- c. Establish job pre-inspection procedures to be carried out by lead-man or foreman and followed by specific instructions regarding hazardous exposures - increase both quantity and quality of supervision.
- d. Continuous audit of all work procedures, coupled with training and discipline as required.

/mf

S T A R T , C O P Y

INITIALS

DATE

BOX NO./FILE DRAWER NO.

SEGMENT NO.

04-01920

SIGNIFICANT

N O T E S