CertainTeed

Date	To	Location an
June 21, 1982	O. H. Kittilstad	VF CORP #4

Subject	From	Location and mail code
INDUSTRIAL HYGIENE RECOMMENDATIONS UPDATE - CLOSED PLANTS	D. R. Hall	VF P&PG #2B/d

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Attached are Corporate Industrial Hygiene recommendations updates for the two P&PG A/C Plants closed in January and June of this year --Ambler, PA and Santa Clara, CA.

D. R. Hall

01-25-0005

AMBLER A/C PIPE PLANT

Industrial Hygiene Recommendations
Follow-Up

Industrial Hygiene Survey, 12/3-7/79
Industrial Hygiene Survey, 1/28-29/80 > IHS-80-1
Engineering Study, 12/3-7/79
Engineering Study, 1/28-29/80
Industrial Hygiene Survey, 3/23-24/81 > IHS-81-10
Industrial Hygiene Survey, 5/5/81

The information following represents the completion status of Corporate Industrial Hygiene department's recommendations as of the last status report to Group Health and Safety prior to announced closure of the plant.

1. That a thorough review of OSHA Asbestos Standard, 1910.1001, be conducted by a compliance panel of plant management personnel to reassess degree of compliance with the standard. Special emphasis should be placed on personal monitoring to determine 8-hour exposures in those positions where excess levels were determined by this survey. (1980 IHS)

   STATUS: Asbestos Monitoring Data Sheets received here in Corporate Health and Safety show calculated TWA's on samples totaling less than 4 hours. The number of people being sampled is ample but an 8 hour TWA is mandatory to determine the full shift exposure and to comply with OSHA Regulations. (Corporate 1981)

   STATUS: 8-hour TWA samples were being taken. However, due to reduced operation through later part of summer and through fall 1981, sample periods occasionally were less than 8-hours. Sample results were forwarded to Group and Corporate Health and Safety departments. (6/21/82 - DRH)

2. That follow-up work consisting of short term samples be taken in and around the restroom, locker room, and lunch room areas. (1980 IHS)

   STATUS: To date Corporate Health and Safety has not received results of these samples. (Corporate 1981)

   STATUS: Samples have been taken of these areas with the fol-

lowing results: Locker Room - Ø.28 f/cc; and lunch room - Ø.16 f/cc.
Neither area should have high dust count exposures simply by their nature and use.
(6/21/82 - DRH)

3. That whenever any changes - minor or major - are made to manufacturing process/systems, fiber exposure measurements should be made and follow-up work done to assure that exposures are well within standards at all times. (1980 IHS)

STATUS: This is an on going recommendation. (Corporate 1981)

STATUS: Normal plant procedure. Completed. (6/21/82 - DRH)

4. That a plant level Respirator Control Unit Program be developed using the concepts presented in Section C of the Certain-Teed Health and Safety Manual and Appendix II to this report. (1980 IHS)

STATUS: Fit testing, one of the requirements of an OSHA Required Respirator Program is not being done. It is doubtful as to the completeness of the rest of the plant's program. Paragraphs 1 and 2 on page 7 in the body of the survey report states: "A very large drawback with the 3M 8710 is that employees cannot be properly fit tested to assure us that when an employee is wearing the respirator, he is being properly protected. Undetected leaks around the nose or face due to facial contour lead to false security that the respirator is in fact offering protection. It is especially important that all employees who are required to wear respirators be fit tested."
"...A single use respirator, 3M 9900, as well as other permanent half-mask respirators approved by NIOSH for protection against asbestos containing dusts should be utilized. These should also be made available to all employees who request a respirator."
At present the 3M 8710 and AO Dust Demon Masks are being used. These respirators are not fit testable as presently required by OSHA and should be replaced by the 3M 9900 for use in required respirator areas and made available to employees requesting them. (Corporate 1981)

STATUS: 3M 8710 respirators and 3M 9900 respirators were used, with type of respirator used dependent upon

specific operation performed. Respirator Control Unit Program, in writing, had been established at the plant 5/13/80. According to 3M, 8710 respirators can be properly fit tested; plant shutdown prevented full implementation of the saccharin method. (6/21/82 - DRH)

5. That housekeeping be improved in the manufacturing area and also that it include vacuuming and cleaning of machine and structural surfaces in and around the area. (1980 IHS)

   STATUS: General Housekeeping has been improved throughout the plant especially in the finishing/fittings departmnet. (Corporate 1981)

   STATUS: Was considered completed. (6/21/82 - DRH)

6. That engineering studies be made to isolate the fiber source at the pipe machine and to explore the feasibility of exhaust ventilation to control fibers. (1980 IHS)

   STATUS: One fiber source has been located at the Pipe Machine which has been somewhat contained by the plastic curtain installed at/below the anvil roll.
   A continual study should be made in this area to be assured levels remain at the present levels.
   (Corporate 1981)

   STATUS: Efforts were undertaken to devise a method to reduce the mist caused by each of the showers which carried the fibers. This action was to eliminate the need for exhaust ventilation. (6/21/82 - DRH)

7. That when dry scrap pieces are moved that they be wet down to control dust during disposal. (1980 IHS)

   STATUS: A wet sweep program is in effect for all dust floors. (Corporate 1981)

   STATUS: Was considered completed. (6/21/82 - DRH)

8. That a series of fiber samples be taken at the shot blaster, shot blasting area, and on the Shot Blaster Operator while it is in operation. (1980 IHS)

STATUS: Samples were taken of the operation; results were forwarded to Group and Corporate Health and Safety departments.
The operation has never been run for more than 1-hour at a time and did not lend itself to 8-hour TWA determinations. (6/21/82 - DRH)

9. That further monitoring be done on those employees involved in scrapping and sanding mandrels while on racks over their heads as well as those resting on the floor. (1980 IHS)

STATUS: Corporate Health and Safety has received results of only 1 sample taken at the Shot Blaster and Mandrel Scrapping Operation which was 1.29 f/cc. It is essential that monitoring be done at this operation to document present levels, and that an assessment be made to determine possible changes that should be made to reduce fiber levels. (Corporate 1981)

STATUS: Samples were conducted of the operation; results were forwarded to Group and Corporate Health and Safety departments. Although cutting pipe off the mandrel occurred rarely, the employee was protected with a respirator and the mandrel was wet to reduce dust generations. (6/21/82 - DRH)

10. That those employees in the Finishing and Fittings department vacuum more frequently throughout the shift to help reduce backround fiber levels. (1980 IHS)

STATUS: The fiber levels in this department have been substantially reduced by the extended effort of supervisors and employees. (Corporate 1981)

STATUS: Was considered completed. (6/21/82 - DRH)

11. The text of this report contains a number of suggestions for the control of noise exposure. If the methods recommended or other engineering and/or administrative controls cannot feasibly reduce the noise to acceptable levels, a hearing conservation program to include the mandatory use of ear defenders and periodic audiometric testing of exposed employees must be implemented. (1980 IHS)

STATUS: Implementation of noise control recommendations are not apparent. Mandatory use of hearing protection must be enforced where applicable. (Corporate 1981)

STATUS: Mandatory use of hearing protectors was enforced, and strict disciplinary procedures set in place. (6/21/82 - DRH)

12. That the heater in the area of the fiber dump be redirected or replaced by a non-forced air heater unit. (1980 ES)

STATUS: Completed 1980. (Corporate 1981)

13. That until the automatic bag opener is put into operation, the blast gate at the fiber dump be positioned to obtain optimal velocity for control of fiber dispersion. (1980 ES)

STATUS: Completed 1980 and the Automatic Bag Opener is presently in use. (Corporate 1981)

14. That a non-asbestos sealer be used in place of the A/C mud presently being used in and around the manufacturing area. (1980 ES)

STATUS: The use of the A/C mud has been reduced, although there are still some places where it is still being used. (Corporate 1981)

STATUS: The use of A/C mud had been eliminated and caulking was used in its place. (6/21/82 - DRH)

15. That the exhaust ventilation to the Mixer/Blender be changed to provide permanent control of dust at this area. (1980 ES)

STATUS: Recent samples show some improvement has been made in the ventilation in this area. (Corporate 1981)

STATUS: Recommendation had never been agreed to. Plant had an excellent closed system. (6/21/82 - DRH)

16. The on-going study should be made of the manufacturing area, especially at the press section/roll up area to determine wind currents and other dust sources, be continued. (1981 IHS)

STATUS: This was a continuing program at the plant. Was considered completed. (6/21/82 - DRH)

17. The use of felt in all areas of the plant and shipping be discontinued. (1981 IHS)

    STATUS: Tires and cardboard were used as chain protection in shipping. Felt near the machine shop was removed. Felt on #1 curring tunnel was removed and replaced with rubber mat. Matting was on order for the #2 tunnel and was to be installed upon being received. (6/21/82 - DRH)

18. The on-going study of the Crusher Area to determine dust sources at this area and to measure the effectiveness of changes be continued. (1981 IHS)

    STATUS: This was an on-going effort at the plant. (6/21/82 - DRH)

19. The problem with the accumulation of tailings at Lathe Line #3 and the Lehman Lathe be studied and corrected. (1981 IHS)

    STATUS: Over $4000 for chip extruders was spent to help eliminate the problem. A full time tin smith was assigned to work on dust control improvements; George Jones worked with the dust control program, supervising it most of the time. (6/21/82 - DRH)

20. Hearing Conservation programs with annual audiometric examinations should be established for employees whose exposures exceed 85 dBA level for an 8-hour period, i.e. a 50% reading on the Audiodosimeter. (1981 IHS)

    STATUS: Annual audiometric examinations were given to each employee as part of the annual physical, regardless of exposure level. (6/21/82 - DRH)

21. Employees with exposures exceeding 90 dBA on an 8-hour Time Weighted Average, i.e. 100% reading on audiodosimeter should be <u>required</u> to wear hearing protection.
    Those job positions tested and found to exceed the 8-hour allowable dose (100%) during the Dec. 79/Jan. 80 survey and this survey are:

    <u>Manufacturing:</u> Machine Tender
    Mandrel Handler
    Tray Loader
    Utility Truck Driver
    Crusher Operator

Finishing/Fittings:

#3 Lathe Operator	FD13 Universal Mill Operator
#3 Lathe Helper	FD28 Korit Drill Operator
#3 Inspector	FD21 Wet Saw Operator
#3 Tester Operator	Pencil Sharpener Operator
FD16 Boring Mill Operator	FD7 Lehman Lathe Operator
FD9 Coupling Saw Operator	FD10 Rework Saw Operator

STATUS: This was done. See recommendation #11 above. (6/21/82 - DRH)

22. The following areas be posted as required hearing protection areas:

a) Lathe Line #3 Operator Work Station
b) Lathe Line #3 Helper Work Station
c) Lathe Line #3 Tester Operator Work Station
d) Lathe Line #3 Inspector Work Station
e) FD 16 Boring Mill Operator Work Station
f) Mandrel Return and Change Conveyor Area
(1981 IHS)

STATUS: Completed. In addition, the following work areas were also posted:
a) #15 Boring Mill
b) #9 Coupling Saw
c) #10 Rework Saw
d) #21 Wet Saw
e) #7 Lehman Lathe
f) #8 Nebel Lathe
g) Pencil Sharpeners
h) Mandrel Person
i) Press Operator
j) Scrap Crusher
k) Lathe Lines #1 and #2 (operator, inspector, tester, operator)
(6/21/82 - DRH)

23. Previous recommendations (Dec. 79/Jan. 80 survey) be implemented and suggestions be considered for Manufacturing and Finishing/ Fittings noise reduction. Help from an outside consultant should be obtained if the expertise is not available within the plant or group. (1981 IHS)

STATUS: Project was assigned to central engineering. After spending much time and thousands of dollars, no appreciable reduction in noise was measured; hence, cost expenditure versus benefit was not realized. (6/21/82 - DRH)

24. A review of all plant positions should be made to determine possible employee noise exposure for all areas of the plant. (1981 IHS)

    STATUS: This was being completed.(6/21/82 - DRH)

25. Until noise is reduced by engineering controls or administrative means, that hearing protection use be enforced. (1981 IHS)

    STATUS: Third time the recommendation is repeated. See recommendation #11 above. (6/21/82 - DRH)

26. When hearing protection is required, several types of hearing protection should be made available for the employees to choose from (i.e., disposable plugs, reusable earplugs - with/without neckcord and ear muffs). (1981 IHS)

    STATUS: Was completed as stated. (6/21/82 - DRH)