PLAINTIFF'S EXHIBIT
FD-1660

File
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Inter Office

Personnel and Organization Staff

September 9, 1982

Mr. D. Boerger
Manufacturing Manager
Sheldon Road Plant

cc W. G. Atkins
J. E. Fisher
W. G. McGruther
O. Schidlowsky, M.D.
J. E. Tennant

Subject: Dust Samples, Asbestos Evaluation - Sheldon Road Plant

Reference: Letters same subject attached - April 19, 1982, April 14, 1981 and April 6, 1981

As requested by Mr. W. G. Atkins, Sheldon Road Plant Safety Engineer, an industrial hygiene evaluation was made of the former heater housing mix room for residual asbestos dust. This evaluation was requested because of plans to use the room for storage and inactive file maintenance. Asbestos has not been used in this room since the middle to late 1970s.

Based on our study of March 6, 1981 which found no airborne asbestos, but asbestos-laden settled dust, recommendations were made in our letter of April 14, 1981 to remove the residual asbestos in accordance with applicable OSHA standards. Instead of complete compliance with our recommendations, a compromise plan was worked out under which the plant would remove the ventilation ductwork, secure the asbestos silos, post warning signs, and use the room only for dead storage.

Subsequent to the implementation of the plan, settled dust samples were taken and presumptive tests made which were negative for asbestos. It should be noted that the room was not thoroughly decontaminated, but since asbestos was not identified in the settled dust found, there was no scientific evidence to base enforcement of the original recommendations given the cost involved in carrying out the recommendations.

Settled dust samples taken on July 28, 1982 at locations similar to those of our previous evaluations indicate asbestos-containing settled dust is present at two of the three locations on the second floor of the room. These samples were analyzed using the NIOSH quick-screening test for asbestos by the Ford Industrial Hygiene Laboratory and confirmed by Clayton Environmental Consultants using X-ray diffraction and polarized light (attached).

Since airborne concentrations of asbestos have not been demonstrated at significant levels and are not probable, we understand the reluctance of the plant to comply with our recommendations of April 14, 1981. However, based on the most recent samples taken, it would appear that residual asbestos may be detected in settled dust on occasion until a thorough decontamination of the mix room takes place.

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Although the use planned for the mix room will probably not expose employees to eight-hour time-weighted airborne asbestos concentrations greater than present standards, it would appear prudent, since asbestos is a carcinogen, to formulate a plan to settle this problem permanently and return the room to unrestricted use. Further, it may be of value to note that the Canton Forge Plant, while not demonstrating significant airborne asbestos levels, has elected to remove asbestos pipe lagging that is falling to the floor and accumulating in a manner similar to the Sheldon Road Plant. The cost of the project of more than $100,000 has been approved by Senior Management. Therefore, we request that an action plan be formulated around recommendations made in our letter of April 14, 1981.

H. B. Lick

H. B. Lick, Senior Industrial Hygienist
Industrial Hygiene & Toxicology Department
Employe Health Services

jb
Attachments

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CLAYTON ENVIRONMENTAL CONSULTANTS, INC.

Results of Analyses
for
Ford Motor Company

Job No. 15386-782-LA

Lab Number	Sample Description *	Asbestos Composition
238954	HBL 1795, Bulk	No forms of asbestos detecte
238955	HBL 1796, Bulk	~3% chrysotile
238956	HBL 1797, Bulk	~6% chrysotile
238957	HBL 1798, Bulk	No forms of asbestos detecte
238958	HBL 1799, Bulk	No forms of asbestos detecte

Analysis performed by x-ray diffraction (XRD) and polarized light microscopy (PLM).

* SAMPLE LOCATIONS

HBL 1795 = 2nd FLOOR NEXT TO ELEVATOR 6051 A

HBL 1796 = 2nd FLOOR RACKS ON SOUTH WALL

HBL 1797 = 2nd FLOOR NEXT TO ELEVATOR 6052 B

HBL 1798 = 1st FLOOR SILO NEAR D11

HBL 1799 = 1st FLOOR SILO NEAR D-9

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