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Position Paper

ALLIED AUTOMOTIVE SECTOR
BENDIX FRICTION MATERIALS DIVISION
LATHAM, NEW YORK
OSHA CLEANING PROGRAM
DIVISION POSITION PAPER

The general housekeeping requirement imposed by OSHA required that all surfaces are to be maintained free of visible accumulations, as is practicable. The cleaning of the Cleveland facility will also sharply reduce background contributions to employee exposure monitoring thereby reducing the number of regulated areas and the accompanying burdens relative to the designation of regulated areas.

In order to comply to our requested compliance schedule variance, the cleaning of the facility must occur immediately. Based upon this time requirement, it is recommended that the cleaning of Cleveland, Tennessee is performed by PBM. The selection of this company for the facility is based upon location of the cleaning company relative to the facility. PBM has indicated that they can be on-site November 17, 1986 if notified by November 11, 1986. Estimated completion date for Cleveland is December 31, 1986.

Craig R. Larson

Craig Larson
Environmental Administrator
November 7, 1986