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DHQ - Asbestos Fiber Sales
August 15, 1972

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BENDIX CORPORATION
SOUTHFIELD, MICHIGAN
ASBESTOS HEALTH SEMINAR 8/8/72

A seminar on Asbestos Health was held at the Executive Offices of the subject company on the above date. The format is attached, as is the list of Bendix attendees. This presentation can form the basis for future J-M presentations on A/H as well as for the A.I.A. regional seminars now being planned.

Our presentation was very well received, and from the Chief Operating Officer on down, all Bendix personnel expressed their appreciation and acknowledged that the information presented is of considerable help to them.

During our visit we had an opportunity to hold meetings with B.B. Burton, J. Armstrong, H. Stolar and C. Menz. These occurred at dinner, breakfast, and lunch as well as immediately before and after the seminar.

Questions were as follows:

1. Cost per employee to meet OSHA TVL Requirements

   a) of 5 fiber/cc (Arthur D. Little Study estimate $1,600/employee

   b) of 2 fibers/cc (estimate $2,800/employee)

2. Accuracy of Tests for fiber content in air (our answer ± 20-25% at TLV of 5)

3. How is brake lining dust disposed of (Resulted in general discussion covering pelletizing, land fill, etc.).

4. Questions by Heitman to Dr. Wright during presentation were answered by Wright's total presentation. An example was risk on grinding linings in garages.

Answer: Do not flow dust off brakes. Use vacuum.

5. Any time limit an employee can be on a job that is hazardous and do we rotate people on such jobs.

   Answer: No, we correct the problem so that the hazard is controlled.

6. Can technological approach work in controlling problems?

   Answer: We do the following

   a. reduce forming and finishing by technical changes.

   b. educate personnel to reduce costs and work better

   c. work towards least expensive solution. Ex use of wet or damp resin mix.

7. Have we been cited by OSHA.

   Answer: Yes

8. How do we handle OSHA Requirement to notify individual employees of stations that are hazardous?

   Answer: (1) Post on bulletin board results of station surveys that are over limit, (2) advise what is being done to correct.

9. Any value in taking your own dust counts side by side with OSHA Inspector?

   Answer: We try to take simultaneous samples.

10. Does #9 help in getting more cooperation from OSHA?

    Answer: We really can't tell any difference. Bendix has tried this and where it was done no citations so far from OSHA.

11. General questions on air samplers and pumps.

    a. How many do we have

       Answer: 100

    b. Cost

       Answer: $150/pump (note we do have some Bendix pumps)

               $ 50/charger

12. How do you secure Industrial hygenists, what type of man and how much training.

    Answer: (1) Secure man with 2 yr. college or college grad. (4 yrs.). Train in house. Takes 6 months for man to become fully operative.

13. How many do you have.

    Answer: 20 full time

14. If glass fiber lodges in lung, what damage.

    Answer:

    a. glass has almost no effect vs. asbestos

    b. However, there is some evidence that very thin glass (micro-fibers) can cause a problem. Still under investigation.

    c. some coatings have been found to render glass inert in the lung.

    d. if we could determine the method of coating particles or fiber similar to the natural method in the lung (by iron & protein) problem would be solved. Work going on in an attempt to do this. PVNP (Polyvinyl N Pyridene) works on some silicates and quartz). On quartz PVNP destroys free bond present on quartz surface.

15. With advent of OSHA have we found any marked increase in compensation claims.

    Answer: No great increase

16. How do you comply with requirements on including employees in Environmental Control Committees.

    Answer: We've done this for years in our employee safety committees - just changed the group's name. This is an excellent employee communication media.

I discussed the possibility of our securing business at the Cleveland Plant with Harry Stolar and Charlie Menz. They were encouraging and I will pursue it through our contacts.

I talked with Bob Burton on August 13 and discussed it with him. He said there was some discussion at the top level on this. I expect our visit will pay dividends. Will keep you informed.

H. G. Donovan

Attachments:

1. Attendees From the Bendix Corporation

2. Agenda

3. Health Aspects of Exposure by Inhalation of Asbestos Fiber

11857 BD

BENDIX MEETING - AUGUST 7, 1972

THE OCCUPATIONAL SAFETY AND HEALTH ACT OF 1970 ESTABLISHES AS LAW LITERALLY THOUSANDS OF SAFETY AND HEALTH STANDARDS. IT PLACES ON MANAGEMENT THE FULL RESPONSIBILITY FOR MEETING THESE STANDARDS.

SLIDE 1 - ON

UNDER THE ACT, THE SECRETARY OF LABOR IS REQUIRED TO ESTABLISH SAFETY AND HEALTH STANDARDS THAT "WILL INSURE THAT NO EMPLOYEE WILL SUFFER MATERIAL IMPAIRMENT OF HEALTH OR FUNCTIONAL CAPACITY IN A WORKING LIFETIME". IN FACT WE HAVE HAD THIS POLICY AS AN OPERATING POLICY FOR MANY YEARS AND WE ARE CONVINCED THAT ANY MATERIAL CAN BE HANDLED SAFELY.

ON APRIL 28, 1971, THE WALSH-HEALY, LONGSHOREMAN AND OTHER FEDERAL ACT STANDARDS-AND-THE NATIONAL CONSENSUS STANDARDS SUCH AS THOSE OF THE NATIONAL FIRE PROTECTION ASSOCIATION AND AMERICAN NATIONAL STANDARD INSTITUTE WERE ESTABLISHED AS OSHA STANDARDS WITH THE FULL EFFECT OF THE LAW.

THESE STANDARDS COVER ACTUALLY EVERY FACET OF ~~OUR~~ MANUFACTURING OPERATIONS AND FACILITIES. THEY RANGE FROM STANDARDS FOR WORK SURFACES, LADDERS, MANLIFTS, SANITATION, MEDICAL SERVICES TO MATERIALS HANDLING, MACHINE GUARDING, WELDING, ELECTRICAL EQUIPMENT TO HAZARDOUS MATERIALS, AIR CONTAMINANTS, NOISE AND RADIATION.

IN THE AREA OF TOXIC MATERIALS ALONE/ THERE ARE EXPOSURE STANDARDS/FOR MORE THAN 500 SUBSTANCES.

A THIRD SOURCE OF OSHA STANDARDS/ARE THOSE PROMULGATED BY THE SECRETARY OF LABOR/AS EMERGENCY,/ REVISED/OR ENTIRELY NEW. THE ASBESTOS STANDARD EFFECTIVE JULY 7, 1972,/ IS AN EXAMPLE OF THIS.

SLIDE 1 - OFF

BECAUSE OF THE SCOPE AND COMPLEXITIES OF SAFETY AND HEALTH MATTERS,/ THE 1970 ACT ESTABLISHED A RESEARCH FACILITY/WITHIN THE DEPARTMENT OF HEALTH, EDUCATION AND WELFARE/TO ADVISE THE SECRETARY OF LABOR. THIS ORGANIZATION IS THE NATIONAL INSTITUTE OF OCCUPATIONAL SAFETY AND HEALTH - NIOSH./ ESSENTIALLY, THIS GROUP WAS FORMERLY THE OCCUPATIONAL SAFETY AND HEALTH SECTION/ OF THE U.S. PUBLIC HEALTH SERVICE/WITH WHOM WE HAVE HAD CLOSE AND SATISFACTORY RELATIONSHIPS FOR MANY YEARS./ UNDER THE ACT, HOWEVER,/ NIOSH HAS A BROADER SCOPE OF RESPONSIBILITY/AND MUCH MORE AUTHORITY. FORMERLY THEY HAD TO OBTAIN INDUSTRY'S WILLING COOPERATION/ON THEIR HEALTH RESEARCH EFFORTS.

SLIDE 8 - ON

NOW/ THEY HAVE THE AUTHORITY TO REQUIRE:

1. THE REPORTING OF EXPOSURE MEASUREMENTS

2. THE REPORTING OF HEALTH EXAMINATIONS AND TESTS

3. INDUSTRY-WIDE STUDIES OF CHRONIC LOW LEVEL EXPOSURES.

4. THEY CAN CONTRACT WITH RESEARCH ORGANIZATIONS - ACADEMIC, INDUSTRY AND STATE/TO UNDERTAKE THESE PROJECTS.

5. THEY HAVE THE RESPONSIBILITY TO ADVISE EMPLOYERS AND EMPLOYEES REGARDING THE TOXICITY OF ANY SUBSTANCE. (C/U AND ON SLIDE TO ANY)

SLIDE 8 - OFF

ONE OF THE MOST IMPORTANT FUNCTIONS OF NIOSH/IS TO DEVELOP AND RECOMMEND TO THE SECRETARY OF LABOR/CRITERIA DOCUMENTS/ FOR NEW OR REVISED STANDARDS.

THE FIRST CRITERIA DOCUMENT THAT NIOSH DEVELOPED/UNDER THEIR NEW AUTHORITY/WAS THAT FOR ASBESTOS FIBER.

WHY ASBESTOS FIRST?/ AN INTERESTING QUESTION./ NIOSH HAS A 5 FACTOR FORMULA/FOR ESTABLISHING THE PRIORITY OF THEIR EFFORTS. WE HAVE BEEN PRIVATELY ADVISED/THAT ON THIS BASIS/ ASBESTOS FIBER WAS RANKED 11TH.

HOWEVER,/ UNDER CONSIDERABLE PRESSURE FROM THE AFL-CIO, THE SECRETARY OF LABOR ISSUED AN EMERGENCY/TEMPORARY STANDARD FOR

ASBESTOS ON DECEMBER 7, 1971. THIS LOWERED THE INITIAL OSHA STANDARD OF 12 FIBERS PER CUBIC CENTIMETER TO 5 FIBERS PER CC. THIS ACTION BY THE SECRETARY SET INTO MOTION - 1. HIS REQUEST TO NIOSH FOR A CRITERIA DOCUMENT, 2. THE APPOINTMENT OF AN ADVISORY COMMITTEE TO REVIEW ALL RECOMMENDATIONS, 3. THE SETTING OF DATES FOR PUBLIC HEARINGS AND FINALLY THE PROMULGATION OF A PERMANENT STANDARD WITHIN 6 MONTHS.

IN DEVELOPING THE ASBESTOS CRITERIA DOCUMENT THE NIOSH STAFF REVIEWED THE FINDINGS OF THEIR 8 YEAR STUDY OF THE ASBESTOS INDUSTRY (IN WHICH WE HAD COOPERATED VOLUNTARILY). THEY SEARCHED THE WORLD SCIENTIFIC LITERATURE, AND CONSULTED WITH A SMALL AD HOC ADVISORY COMMITTEE WHICH INCLUDED OUR MEDICAL CONSULTANT, DR. GEORGE WRIGHT. ON OUR INITIATIVE, ~~BERP-JO~~BE ~~AND~~ SEVERAL OF US MET WITH DR. KEY, THE DIRECTOR OF NIOSH, TO PROVIDE SOME INDUSTRY INPUT.

THE STORY IS MUCH LONGER THAN THIS AND MANY MORE J-M PEOPLE WERE DEEPLY INVOLVED BUT IN OUR OPINION, THE NIOSH CRITERIA DOCUMENT SUBMITTED TO THE SECRETARY OF LABOR WAS NOT REASONABLE, PRACTICAL, SOUNDLY BASED NOR TO OUR LIKING. NEITHER WERE THE RECOMMENDATIONS OF THE SECRETARY OF LABOR'S ADVISORY COMMITTEE WHICH WAS APPOINTED TO REVIEW THE NIOSH CRITERIA DOCUMENT.

SUBSTANTIAL J-M AND INDUSTRY INPUT WAS DEVELOPED, PRESENTED AND WRITTEN INTO THE RECORD AT THE PUBLIC HEARINGS CONDUCTED BY THE DEPT. OF LABOR IN WASHINGTON IN MARCH.

THE CREDIT LIST OF THOSE J-M'ERS WHO SPENT HOURS, DAYS AND EVEN WEEKS IN THESE EFFORTS IS TOO LONG TO ~~READ~~ LIST HERE BUT IT INCLUDED SEVERAL OF OUR CORPORATE VP'S AND MANY OTHER MANAGEMENT PERSONNEL.

SLIDE 9 - ON

THE ACT REQUIRES THAT ALL STANDARDS NEWLY DEVELOPED BY OSHA WILL PRESCRIBE:

LABELS THAT WARN EMPLOYEES OF ALL HAZARDS

PROTECTIVE EQUIPMENT AND PRECAUTIONS FOR SAFE USE

METHODS AND INTERVALS FOR MEASURING AND RECORDING EMPLOYEE EXPOSURE

TYPE AND FREQUENCY OF MEDICAL EXAMINATIONS AND TESTS

ON JUNE 7TH THE SECRETARY OF LABOR PROMULGATED THE FIRST OSHA DEVELOPED STANDARD - THE PERMANENT STANDARD FOR ASBESTOS FIBER - WHICH INCLUDED ALL OF THESE FACTORS.

SLIDE 9 - OFF

SLIDE 10 - ON

EFFECTIVE JULY 7, ~~1972~~, THE THRESHOLD LIMIT VALUE FOR ASBESTOS IS 5 FIBERS PER CUBIC CENTIMETER FOR AN 8 HOUR TIME WEIGHTED AVERAGE WITH A CEILING LIMITATION OF 10 FIBERS PER CC.

ON JULY 1, 1976, THE TLV IS 2 FIBERS PER CC - AN 8 HOUR TIME WEIGHTED AVERAGE WITH A CEILING OF 10 FIBERS PER CC.

THERE ARE SPECIFIC STANDARDS AND REQUIREMENTS SPELLED OUT IN DETAIL FOR:

EXHAUST VENTILATION

RESPIRATORY EQUIPMENT AND PROTECTIVE CLOTHING

LABELS AND WARNING SIGNS

ENVIRONMENTAL MONITORING AND RECORDS

MEDICAL EXAMINATIONS, TESTS AND RECORDS

EMPLOYEE NOTIFICATION AND ACCESS TO RECORDS

AT A RECENT WASHINGTON MEETING WITH OSHA STANDARDS AND COMPLIANCE MANAGEMENT PERSONNEL, WE OBTAINED VERBAL APPROVAL TO USE OUR PRESENT INVENTORY OF J-M LABELLED CONTAINERS AND BAGS BEFORE CHANGING TO THE NEW LABEL REQUIRED AS WELL AS CONCURRANCE ON OUR INTERPRETATION OF SEVERAL OF THE REQUIREMENTS.

SLIDE 10 - OFF

OTHER CRITERIA DOCUMENTS ALREADY IN PREPARATION WILL HAVE SUBSTANTIAL IMPACT ON OUR [illegible] OF [illegible] OPERATIONS. ~~AS WELL~~. THESE WILL BE READY FOR THE SECRETARY OF LABOR TO REVIEW WITHIN THE NEXT 6 TO 12 MONTHS. AMONG THESE ARE HEAT STRESS, NOISE, SILICA, LEAD, TOLUOL AND FIBER GLASS.

FROM OUR ASBESTOS STANDARD EXPERIENCE, IT IS OBVIOUS THAT THE TIME AND TALENTS OF MANY ~~J-M~~ ARE ESSENTIAL TO THE PROTECTION OF OUR INTERESTS AND I'M SURE YOURS, THROUGH THE DEVELOPMENT OF VALID, PRACTICAL OSHA STANDARDS.

IN ADDITION TO ~~J-M~~ MANAGEMENT'S RESPONSIBILITY TO IMPLEMENT THE ALREADY ESTABLISHED OSHA STANDARDS WITHIN THEIR ORGANIZATION, EACH OF US HAS, AS WELL, THE RESPONSIBILITY TO DO WHATEVER IS NEEDED TO INSURE THAT OUR BUSINESSES ARE NOT CRIPPLED BY UNWARRANTED, ILL-FOUNDED OSHA STANDARDS AND REQUIREMENTS.

IN THE INFORMATION MANUAL [illegible] FURNISHED TO YOU WE HAVE INCLUDED OUR INTERNAL J-M "OSHA LETTERS" - #8 AND #9. THEY INCORPORATE OUR INTERPRETATIONS OF THE SPECIFIC ASBESTOS STANDARD REQUIREMENTS, AS WELL AS J-M POLICY. ~~WE TRUST THEY TOO~~ ~~THEY MIGHT BE USEFUL~~ TO YOU AS A REFERENCE.

THE RESPONSIBILITY FOR THE CORPORATE ADMINISTRATION OF OSHA COMPLIANCE IS WITHIN MY OFFICE. WE USE THIS FORM OF COMMUNICATION TO ADVISE ALL CORPORATE AND DIVISION MANAGEMENT OF THE CURRENT AND DETAILED OSHA REQUIREMENTS. WE TRUST THAT THEY WILL [illegible] YOU [illegible] REFERENCE.

[illegible]