U. S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
~~SUITE 600~~ TEXACO BUILDING
1512 COMMERCE STREET
7th Floor
DALLAS, TEXAS 75201

PLAINTIFF'S EXHIBIT
tabbies
U-619

DATE: December 14, 1971
REPLY TO:
ATTN OF: 6OSHA

SUBJECT: Regular Inspection - Pittsburgh Corning Corporation, Owentown Plant, Tyler, Texas

TO: C. M. Freeman, Area Director, Dallas

This inspection covers potential hazards identified by NIOSH as defined in their letter of November 16, 1971, addressed to James E. Peavy, M.D., Commissioner of Health, Texas State Department of Health. Their report was originated by an investigative team headed by William M. Johnson, M.D., and goes in depth into conditions found at this plant. Subject report indicates a serious health hazardous condition which requires immediate correction. Considerable data regarding personnel exposure to excessive concentration of asbestos fiber is included. Inadequate ventilation and poor housekeeping are indicated as two of the prime reasons for these conditions.

An inspection was made by John P. Boyle and C. R. Holder on November 23 - 24 and November 29 - December 1.

ABSTRACT

A series of airborne samples of asbestos dust were taken to establish acceptable data for evaluation of the potential hazards. Several jobs were monitored including fiber feeding, part building, sawing, part inspection and packaging. The survey also included ventilation, review of control programs and personnel protection, housekeeping and a review of medical records.

Production operation within the plant produced continual excessive levels of asbestos dust (see operation test data.) These conditions are primarily due to a lack of acceptable confinement and inadequate process ventilation. Other criteria which add to the problem include operation and maintenance practices as well as poor housekeeping. It should be stated here that housekeeping for control of a toxic dust such as asbestos is much more critical than housekeeping in the usual sense of the word.

Personnel exposure in production areas is controlled by respiratory protection.

The respirators in use are MSA ultra filter units approved for toxic dust applications.

As defined in 1910.13(a)(1), page 10590, "in the control of those occupational diseases caused by breathing air contaminated with harmful dust, fogs, fumes, mists, gases, smokes, sprays, or vapors, the primary objective shall be to prevent atmospheric contamination."

Alleged violations are submitted for immediate correction in order to maintain minimum feasible control standards. Additional items are submitted for correction prior to January 31, 1972, if the company wishes to continue to operate. Such items are major modifications which would take considerable time to complete, although they are feasible and would be necessary to assure effective fiber dust control. It should be noted that Mr. Van Horne of Pittsburgh Corning Corporation has stated that it is his intention of closing the plant on January 31. Company employees have been notified of this intention. This report includes several sections of supplementary data which are included as attachments to the basic report. These attachments are listed as follows:

1. The survey , as submitted to Dr. Peavy by NIOSH on November 16, 1971.
2. Operation Test Data.
3. Work History Data for Monitored Personnel.
4. Weighted Average Calculations.
5. Ventilation Data.
6. Photographic Records.
7. Medical Report Data.
8. Existing Control Programs at Pittsburgh Corning for Personnel Protection.
    a. Respiratory Program.
    b. Material Substitution Status.
    c. Vacuum Cleaner Usage.
    d. Shutdown Procedure
    e. Product Usage by GSA.

RECOMMENDATIONS

The following alleged violations must be corrected immediately to maintain minimum feasible control standards:

Item Number	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Date on Which Alleged Violation Must Be Corrected
1.	1910.134(b)(10) Page 10590	New Personnel have been assigned to tasks requiring respirators without a preliminary physical examination to establish that they are physically able to perform the work and use the equipment. (Physical exams discontinued about two years ago per Mr. Van Horne on 12/1/71)	Immediate
2.	1910.134(a)(1)	Three open air vents on air operated drive of large saw, in finishing dept. discharge into base area under conveyor creating excessive dust turbulence. (Excessive time weighted exposure levels for John Ridway,55 fibers greater than 5 microns per cubic centimeter, and Jerry Moore, 95 fibers greater than 5 microns per cubic centimeter.)	Corrected on Same Day
3.	1910.134(a)(1)	A fourth air vent from the air operated drive of the large saw in the finishing dept. discharges into the exhaust hood for the North cut off saw, thereby reducing its exhaust efficiency. (Excessive time weighted exposure levels for John Ridway, 55 fibers greater than 5 microns per cubic centimeter, and Jerry Moore, 95 fibers greater than 5 microns per cubic centimeter.)	Immediate

Item Number	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Date on Which Alleged Violation Must Be Corrected
4.	1910.141(a)(3)(ii)	Housekeeping inadequate for dust control a) Work areas not cleaned, immediately after use. b) Fiber and dust accumulation on equipment surfaces. c) No provision made to clean such surfaces without supply air.	Immediate
5.	1910.134(a)(1)	Inadequate confinement of dust hazardous operations due to unposted open doors on East side of building which disturb exhaust ventilation system control. (Creates excessive personnel exposure.)	Immediate
6.	1910.134(a)(1)	Piped air is being used to blow off cut insulation pipe sections at end of conveyor outside the exhaust hood on the small saw unit. This is adjacent to the automatic tying machine. (Excessive personnel exposure.)	Corrected on Same Day
7.	1910.134(a)1)	Air is being used at the small saw to blow off equipment during usage. (Excessive personnel exposure.)	Immediate
8.	1910.134(a)(1)	Solid back up block for block saw trimmer unit interfers with local exhaust duct access to trimming operation.(Excessive operator exposure.)	Immediate
9.	1910.134(a)(1)	Inadequate enclosure of feeder units, a) open backs, b) open inspection plates, c) miscellaneous openings on sides of feeders for drive maintenance etc. (Excessive personnel exposure, Jones and Brock.)	Immediate

Item Number	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Date on Which Alleged Violation Must Be Corrected
10.	1910.134(a)(1)	No adequate set schedule for inspection of ventilation system to prevent duct pluggage, etc.	Immediate
11.	1910.134(a)(3)	Respirator not worn properly by production personnel, as observed by J. Boyle.	Corrected on Same Day

In order to operate after January 31, 1972, all alleged violations must be corrected or in work as approved by the Regional Administrator including those necessary for minimum control and others necessary to reduce dust levels to acceptable levels:

1 - 11	Same as before		
12.	1910.134(a)(1)	Bag filters which handle asbestos dust are discharging contaminated air inside the building. a) Builder and feeder bag filter, b) Scrap feeder unit, c) Block saw unit.	Jan. 31
13.	1910.134(a)(1)	Feeder transfer belts have inadequate confinement.	
14.	1910.134(a)(1)	The block saws have insufficient enclosure and/or isolation.	Jan. 31
15.	1910.134(a)(1)	Insufficient dust control in saw transfer areas between end trim and splitting operations.	Jan 31
16.	1910.134(a)(1)	The ventilation system for the feeder system and the builder requirements has insufficient air capacity. Carrying velocities in the ducts are too low and system pluggage occurs.	Jan. 31

John P. Boyle

JOHN P. BOYLE
Industrial Hygienist