

FILE NAME: Allied Signal Bendix (ASB)

DATE: 1990 May 2

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DOCUMENT DESCRIPTION: Memo RE OSHA Proposed Standard with
Handwritten Notes

Memorandum

Bendix

Bendix Friction Materials Division
Green Island, New York

cc: T. Rancour
H. Scott



Date: May 2, 1990
To: T.P. Rancour (FAX)
From: C.R. Larson
Subject: OSHA Proposed 0.1 f/cc Asbestos Standard

7/25/90 To: D. Carter } Please review +
V. Keim } revise as needed.
Need to have revision by
August 3, 1990 for submission to
Sector/Corporate.

Thanks
Craig

The following information is provided regarding the potential impact upon the plants if the standard were to be passed "today".

Include all
employees

- (1) If the 0.1 f/cc standard were passed "today", how many employees would be required to wear respirators?
Cleveland-seven (7) employees
Troy-ninety (90) employees
- (2) How many regulated areas do you have as of today?
o How many employees?
Cleveland-one (1) work station/three (3) employees
Troy-twenty (20) work stations/sixty (65) employees. The increase in work stations is due to restructuring of the work stations and the increase in employees is due to expansion to three shifts.

*** Both don't include maintenance employees ***

- (3) How many work stations would exceed the 0.1 f/cc standard that are presently below the 0.2 f/cc standard?
Cleveland-seven (7) work stations
Troy-twenty (20) work stations
- (4) What is your opinion on the feasibility of adding engineering controls to reduce employee exposures to below the 0.1 f/cc PEL?
Cleveland- Preventative maintenance will be the key to insure maximum efficiency of current ventilation.
Troy- It is believed that additional controls (could be added) to reduce the exposures to below the 0.1 PEL, however, the likelihood of obtaining permit is extremely remote.

how?
what?

The timing of this regulation could drive Troy out of the market-place if the regulation were passed in 1991. The permitting timeframe would extend well into 1992 and with the EPA asbestos ban of August 93, there wouldn't be time



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for installation of additional ventilation equipment before the EPA ban went into effect. Logic would dictate not to spend any capital for additional ventilation in light of the business being curtailed in the immediate future.

There is also concern in Tennessee regarding the states response to increased emissions of asbestos. The State has already indicated that increasing asbestos emissions either from increase in production or ventilation is not acceptable. Dispersion modeling/impact analysis/risk assessments were discussed by the State for any increase in emissions. If the Cleveland facility required additional ventilation controls, conceivably, the timing for the approval for a permit to construct could be similar to Troy. The amount of time required to perform the testing and analysis is extensive and could severely impact upon the plants. This concern has to be hammered home to OSHA that the permitting timetable for increased ventilation controls could violate the timetable for compliance to reduce the asbestos PEL to below 0.1 f/cc. This issue is a serious concern for FMD and has to be put into the record relative to comments submitted.

Please advise if further information is needed:

Craig R. Lamm

CC: J. Bateman
J. Fountain
J. Herman
K. Macon
K. Miller
H. Scott