

debonded. After the burning process, the brake shoes are separated from the lining and the shoes are placed back in the original barrel for further processing. A local exhaust ventilation system has been provided for the dump table within the burn room. However, this exhaust vent is positioned above the table and draws asbestos fibers through the operator's breathing zone prior to removal from the work place. This local exhaust ventilation system is inappropriately designed.

E. Disc Brake Riveting

In this department, new pucks are riveted onto disk plates. Mechanical rivet presses are used to install these pucks. No local exhaust ventilation is provided in the vicinity of these operations.

II. Hazard Communication Program

A list of chemicals used within operations has been compiled by department. Material Safety Data Sheets have been obtained for all of these chemicals and have been compiled within a notebook. This chemical list and the Material Safety Data Sheets are readily available for employees to review at their convenience. These Material Safety Data Sheets are periodically reviewed and updated to ensure they are current.

A formal, written Hazard Communication Program has been developed and implemented for this location. This written program includes provisions for container labeling with chemical contents and hazard warnings, employee training regarding interpretation of MSDS's, proper chemical handling procedures, proper use of personal protective equipment, and the periodic review of MSDS's.

Employee training sessions are conducted annually. These training sessions are documented and documentation is maintained on file. Employee training is vital in the success of an effective communication program.

Two publications have been enclosed with this report to assist you with compliance regarding OSHA's Chemical Hazard Communication Standard. These publications include:

OSHA's Chemical Hazard Communication Standard - 1910.1200.
"Chemical Reactions", Volume XII, No. 2.

Chemical Hazard Communication, U. S. Department of Labor