

FILE NAME: Firestone (FIRE)

DATE: 1978 Mar 10

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DOCUMENT DESCRIPTION: Closing Conference of Feb 2 OSHA Inspection reviews airborne hazards, noise & safety issues [Ex. 934]

MARCH 10, 1978

CLOSING CONFERENCE - INDUSTRIAL HYGIENE

OSHA INSPECTION

Present for OSHA:

Fritz Bock
Sandy Witek

Present for the Company:

M. I. Yonas
J. E. Stirrett
K. L. Howard
D. L. Steele

The meeting was held to advise the Company of the progress made during the inspection held this week due to a complaint filed with OSHA on February 9, 1978.

OSHA Industrial Hygienist Bock acted as spokesman for the OSHA representatives. The following items were discussed.

1. In response to Item 8 in the complaint which alleges that polychlorinated biphenyls are present on the floor in the penthouses. The OSHA spokesman stated he could find no evidence to support this claim. He went on to state that in all probability the referenced substance is water rather than polychlorinated biphenyls and presents no hazard.
2. In response to Item 3 in the complaint which alleges use of chemicals in the steam room, the OSHA spokesman stated his observation indicates there is no hazard. In his opinion if, in fact, there is eye irritation, it is probably due to the soap substances used and the exposure is infrequent and of short duration.
3. In response to Item 21 of the complaint which alleges lack of ventilation in the mold shop, the compliance officers were unable to see this operation in use and on a subsequent visit will try to take air samples while the welder is in use. The compliance officer stated that his inspection revealed that only general ventilation is available and this normally is not adequate. He went on to state that he would prefer observing this operation in normal use, rather than setting up a demonstration.

Pltf Exh

934

4. This item is not mentioned in the formal complaint, but was investigated due to complaints made orally during the inspection. This complaint deals with the glue used in the creel room during the change of fiberglass creels. Again, there was no opportunity to observe the operation. The compliance officer indicated he will check with his lab in Salt Lake City to see if a suitable means is available to take air samples. Mr. Yonas, the Company spokesman, responded by informing the compliance officer that the glue in question has been thoroughly evaluated by corporate hygienist and no special handling or precautions are necessary. To this the OSHA spokesman replied he feels he is obligated to take samples and inform employees there is no hazard involved.
5. Sandblasting--this item was also investigated based on an oral complaint and the OSHA spokesman states that he feels the filter elements in the sandblasting are not adequate and something should perhaps be done on the plant level to correct the problem. He went on to state that the exposure here is infrequent and does not present a real hazard. The Company spokesman stated that the unit is due to be moved and corrective action will be taken at that time. The OSHA spokesman again stated that he felt this is something best handled by plant personnel.
6. This item was in response to Item 19 concerning the ventilation in the battery charging area. The OSHA spokesman stated he had taken air samples in order to detect stibine. He then stated that during his sampling procedure he could detect acid fumes in the air sufficient enough to cause him to cough; therefore, during his next visit to the plant, he will sample with another type of test device to check the presence of acid fumes in the air. Also according to his conversation with the A Shift employees prior to startup Sunday night, when the batteries are put on full charge, it causes them to smoke which creates a problem. He indicated that during his next visit, he would want to be in the plant during this time period to see if this complaint is based on fact.
7. This item was in response to Item 31 on the complaint. The compliance officer indicated that he had taken air samples in the Banbury department to evaluate the amount of carbon black in the air. He stated the OSHA standard is 3.5 mg. per cubic meter. He stated that he will take the test filters back to Peoria, dry them, and weigh them to determine the amount of carbon black content. To this the Company questioned if he was going to make any attempt to separate the carbon black from other types of dust which were trapped in the filters. As an example, the Company spokesman indicated there may be soap dust in the sample along with the carbon black.

The OSHA spokesman stated it was his understanding that the only dust in the air was carbon black. The Company spokesman explained there was a problem in another Firestone Tire & Rubber Plant concerning the separating of carbon black from other dust. The OSHA spokesman indicated he would check with the laboratory personnel to see if there was any way to separate the carbon black from other dust and if not, during his next visit, he will take another sample to determine the amount of respirable dust in the area.

8. This item was in response to an oral complaint concerning the compound room in Department 112. According to the OSHA spokesman, during a walk-through examination of this area, he noticed the employees were not following precautionary directions on the bags of material they were handling. He went on to state he does not feel the employees are being given enough information on handling techniques. He went on to state that he understands we have a procedure for handling resorcinol; however, employees he talked to stated they were not aware of this procedure. Also, before he returns, the OSHA spokesman stated he would research all of the compounds that he observed while at the plant.

At this point a Company spokesman explained the agreement that Firestone has with the University of North Carolina in conjunction with the Corporate Hygiene Department concerning procedures for handling of all compounds. The OSHA spokesman then added he feels the ventilation system in the compound weighing area is blocked and needs to be cleaned and repaired. He added that on both occasions while in the area the eye wash was blocked--first by a fan and secondly by a box of plastic bags.

9. The OSHA compliance officer then questioned the contents of "benny." The Company spokesman stated there is no benzene in use in our plant and that what some employees insist on referring to as "benny" consists of aromatic solvents such as naptha and heptane which are sampled continually for residual amounts of benzene.
10. This item was also in response to an oral complaint pertaining to supervision refusing to provide respirators to employees upon request. This discussion revolved around the blanket statement, "Anybody who wants a respirator should get one." In the Company spokesman's opinion, a common sense approach should be used in making this determination. The statement was offered by the Company that if there is any question as to the need for a respirator, the Safety Department or Plant Protection will make the determination and provide the respirator if, in their opinion, it is necessary. To this, the OSHA compliance officer stated he was not satisfied with the answer but the discussion would move on.

The Company was then informed that the OSHA compliance officer had found some respirator cartridges with obsolete approval numbers. However, none were in use so no issue would be made of this subject. At this point the OSHA spokesman did state that a non-serious citation would be issued for the Company's failure to keep written records of inspections of the Scott air packs. He went on to suggest a more formalized training program be instituted in the proper procedure for inspecting this equipment. On the next visit to the plant he will be interested in checking the other five (5) air packs.

11. This item was not the result of any complaint but was investigated when the compliance officer noticed that we operated x-ray machines in the plant. He stated a check of the exposure records indicated no hazard to the personnel in the area but he did question the type of checks made on the equipment. It was explained by Mr. Howard that the State of Illinois checks the units each year and the Company makes checks twice a year and any time the equipment is moved. The compliance officer seemed satisfied with this explanation.
12. This is in response to Item 18 of the complaint. During this visit the compliance officers equipped nine (9) employees in Department 149 with dosimeters. To begin this discussion he gave the following results from those checks:

M-2	93.32 dBa	140.8%
M-3	93.35 dBa	141.1%
M-5	93.64 dBa	145.9%
M-6	93.28 dBa	130.6%
M-8	90.70 dBa	96.6%
M-9	90.79 dBa	97.2%
M-11	92.14 dBa	116.9%
M-15	91.56 dBa	107.1%
M-14	92.99 dBa	131.2%

According to the OSHA spokesman, the OSHA standard for noise is 90 dBa which equates to 100% on the scales listed above. However, due to the possibility of error with the recording equipment, a tolerance of 30% is allowed; therefore, anything in excess of 130% results in a citation being issued.

The Company spokesman attempted to point out that time has an affect on the readings and the samples taken were for less than eight (8) full hours and did not include the time period of 2:30 - 3:00 P.M., the last 1/2 hour of the shift. Due to the fact that this time period is used by employees to shut down the equipment, there would be a low exposure rate which has been omitted from the sample. The OSHA

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spokesman then stated this would have no affect because the dBa rating would not go down but would simply not go up. The Company spokesman stated that we have been aware that Final Inspection is a borderline area in regard to noise level. He went on to explain that extensive studies have been done by the plant safety engineer and corporate hygienist and in all instances, the results were lower than those obtained yesterday. Most of the problem results from the fact that the work station covers a great deal of distance with different amounts of time spent at these different locations and the differences in the noise levels. The OSHA spokesman explained that during a walk-through inspection, the noise level occasionally reached 96 dBa for a short period of time. He went on to state that he agrees that the constant levels are borderline, but there are short loud bursts in the area. He stated he could offer guidance to the Company to resolve the problem, but it was not his job to solve it. The Company spokesman explained that in his opinion the solution to the noise problem is not apparent at any cost; however, experiments and studies are and have been in progress in an attempt to lower the noise level. The OSHA compliance officer stated that a citation would be issued and that he feels it should be a non-serious citation. He went on to suggest a one year abatement period which he will recommend to the area director.

The Company spokesman closed the meeting by stating that he did not agree that the sample taken was representative and would not, therefore, agree to the one year abatement period.

It was determined that the inspectors would again visit the plant within the next few weeks to reevaluate and/or expand on the items listed above.

LABOR RELATIONS DEPARTMENT

DLS:cc

BATO/JACKSON 009664

What has been done so far?

Return after next wk.

#8. Looked at $\rightarrow$ no hazard

Steam room $\rightarrow$ No hazard.

#21 - Mold Shop - Vent. Usually not adequate try to catch when comes back. Will be looking for isocot al.

Creel Room - Blue. Did not see in operation. Will attempt samples when comes back.

Sandblasting operation - Inefficient filters. Dust being blown out exhaust. Solids in plant. Back to us. Doct work for dust leaving bag.

Battery charging area. (#19) Steibine 2 samples. Will do some sampling next time for acid fumes. High Conc. off on Sun startup.

C, B 3.5 $\mu\text{g}/\text{meter}^3$ - Separate C B from samples. Brought up about ~~separating~~ separating C, B.

Cpd Room - Felt not enough info given to employees. Suggesting $\rightarrow$ better inform employees on chemicals. Sulphur weighing area. Eyewash in cpd room.

Questioned "Benny".

Availability of respirator. Question.