PLAINTIFF'S EXHIBIT

FD-1758

December 5, 1973

Mr. A. W. Carpenter, Manager
Personnel Services
Glass Division

cc D. C. Lederach, M.D.

Subject: Fibrous Talc Dust Exposure - Dearborn Glass Plant

A recent study of employe inhalation exposure to fibrous talc dust at Dearborn Glass Plant disclosed exposures in excess of OSHA limits for asbestos. The U. S. Department of Labor regards fibrous talc as asbestos; the same exposure limits and regulations apply to both materials. Federal regulations regarding these exposures are covered in the October 18, 1972 Federal Register, Volume 37, No. 202, pages 22142-22144 (1910.93a. Asbestos). Ford Motor Company requirements are covered in recently issued Industrial Relations bulletins (Nos. 7 and 8).

Overexposed employes were Messrs. Pollard and Thomas, Badge Nos. 6632 and 6169, respectively. Your office will receive a report of the study results within a week.

The law requires that overexposed employes be notified accordingly. It is the opinion of the Office of the General Counsel, Labor Relations and ourselves, that the intent of the law will be met if a short note is presented to the employe in an informal manner by the plant safety engineer.

Recommended wording of this note is:

> Mr. (Employe's Name) Date
>
> In compliance with the federal Occupational Safety and Health Act, this is to notify you that air samples collected in your work area on November 14, 1973 showed fibrous talc dust concentrations in excess of established acceptable limits. Measures adopted by the Company to reduce this exposure within acceptable limits will be explained to you by your foreman.
>
> Signed (Safety Engineer)

We believe the foreman should explain the health and safety protection provided employes where such protection is needed and that he ensures employes abide by the requirements.

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Further, we believe having the safety engineer deliver the note in person will provide an opportunity for discussion and lessen the potential undesirable effect a letter could have when opened at home by the employe.

We recommend that a copy of the note be filed with the employe's medical records and another copy be sent to Industrial Hygiene for filing with the study report.

As an interim measure, overexposed employes must be furnished with respiratory protection. It is recommended that all employes on this operation be furnished approved disposable 3M filter respirators because results indicate that all employes studied have similar exposures even though only two were technically overexposed. From an industrial relations standpoint, it would appear prudent to us to provide this protection to all employes doing similar work.

OSHA regulations require that we obtain samples from all employes who may be potentially exposed. We will arrange to sample on all shifts. Nashville Glass Plant employes will also require evaluation.

The following steps are recommended to control employe exposure to sprayed fibrous talc dust.

In order of decreasing effectiveness:

1. Substitute a nontoxic material for fibrous talc. Research efforts at Glass Technical Center should be increased to this end.

2. Study feasibility of change in work methods or alternative application methods such as rolling or brushing talc onto glass surfaces. Automatic application in enclosed areas may be possible.

3. Improve mechanical exhaust ventilation of sprayed dust. Present overhead canopy hoods may have to be discarded or modified in favor of more efficient side draft exhaust booths. Enclosed on three sides, a suitable plenum should be designed so that there is a uniform average face velocity of 150 cfm/ft^2. Disruptive cross drafts should be minimized by effective shielding and no use of pedestal fans.

4. Institute administrative controls such that employes with potential overexposure are rotated to jobs with lower or no talc dust exposure.

5. Failing the above methods, the Department of Labor would permit use of approved respirators.

We would appreciate notification of plans to be taken by Dearborn Glass Plant to protect employe health at talc dust spraying operations. We will cooperate with engineering personnel in the design of and selection of suitable maintenance procedures for dust control equipment.

Roger L. Wabeke
Senior Industrial Hygienist
Industrial Hygiene Section

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