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& Recommendations



MEMORANDUM

CO-14 REV. 12-54

Note: Please use reverse side for
answer, if necessary.

TO: E.H. FIERABOND

LOCATION

DATE JAN. 12, 1987

FROM

DON JOHNSON

SUBJECT

ASBESTOS STANDARD 0.2 FIBER/CC

AS OF THIS DATE WE HAVE STILL NOT ACTED ON ANY OF
THE INFORMATION OR RECOMMENDATIONS CONTAINED IN
THE NATALSOO REPORT OR MY ANALYSIS.

I DON'T KNOW IF YOU ARE THE RESPONSIBLE PERSON FOR
HANDLING THIS SINCE THE ADVENT OF RUSS ARMOR OR NOT
SO I WILL SEND HIM A COPY OF THIS NOTE ALSO.

WE ARE RISKING SEVERE PROBLEMS IF ACTION IS NOT
TAKEN SOON.

I ALSO BELIEVE THAT THIS SHOULD BE HANDLED BY THE MEDICAL
DEPARTMENT OF OUR ORGANIZATION AND WOULD BE VERY HAPPY
TO TURN ALL THE DATA OVER TO WHOMEVER WILL ACCEPT IT.

cc! RUSS ARMOR

cc! VINCE WEISS

SPNY 000563

E. H. FEIGERBEND
V. A. WEISS

Dec. 4, 1986

1 of 6

Compound Department — ALL ^{1ST SHIFT} ABOVE ACTION LEVEL BUT NONE OVER THE TWA. EACH 1ST SHIFT OPERATOR HAS (1) ONE READING WHICH EXCEEDS THE TWA.

Rolling Department — NO READINGS OVER THE ACTION LEVEL
Book Press Dept. — FIRST SHIFT (1) ONE OPERATOR EXCEEDED ACTION LEVEL — EACH OPERATOR HAD (1) ONE READING OVER ACTION LEVEL.
NO READINGS EXCEEDED 0.2 F/CC

SECOND AND THIRD SHIFTS ARE ALL EXCEEDING 0.2 F/CC
RUNNING THE SAME PRESSOS WITH THE SAME FORMULAS!!

EITHER WE HAVE A COMPLETE FAILURE OF THE AIR HANDLING SYSTEMS ON 2ND & 3RD SHIFT (ATMOSPHERIC CONDITIONS?) OR A MAJOR BREAKDOWN IN METHODS TRAINING (SUPERVISION).

I RECOMMEND WE PUT ALL OPERATORS ON 2ND & 3RD SHIFTS IN RESPIRATORS IMMEDIATELY AND BEGIN A MANDATORY METHODS TRAINING. AFTER 3 WEEKS A NEW STUDY SHOULD BE MADE FOR 2ND & 3RD SHIFTS. IF READINGS DO NOT COMPARE WITH 1ST, WE WILL THEN MAKE BOOK PRESS A "REGULATED DEPARTMENT" AND REQUIRE ALL SHIFTS TO USE RESPIRATORS.

Book Press Department — ONE OPERATOR ON 1ST SHIFT WAS TESTED + ONE OPERATOR ON 2ND SHIFT NEITHER HAD ANY READING AT OR OVER THE ACTION LEVEL. (3) OTHER OPERATORS ON 3RD SHIFT WERE CHECKED (1) HAD ALL READINGS OVER ACTION LEVEL, (1) HAD 1 READING OVER ACTION LEVEL, OTHER NONE.

I RECOMMEND METHODS TRAINING FOR PHYLLIS BARNES AND RETEST ON SAME JOB AFTER 3 WEEKS.

BLOCK PROGRAM DEPARTMENT — TWO (2) OPERATORS ON 1ST SHIFT DO NOT EXCEED ACTION LEVEL, ONLY OPERATOR CHECKED ON 2ND SHIFT EXCEEDED O.Z. POL (TWA) ONLY OPERATOR ON 3RD SHIFT EXCEEDED ACTION LEVEL.

I RECOMMEND PLACING ALL 2ND SHIFT PROGRAM OPERATOR IN RESPIRATORS IMMEDIATELY AND PROVIDING INTENSIVE METHODS TRAINING WITH A RETEST 3 WEEKS LATER. IF READINGS STILL EXCEEDED TWA THEN "REGULATE" ENTIRE DEPARTMENT ALL 3 SHIFTS REQUIRING WEARING OF RESPIRATORS.

I ALSO SUGGEST THAT METHODS TRAINING BE PROVIDED FOR 3RD SHIFT EMPLOYEES AND A RETEST IN 3 WEEKS.

BLOCK PRESS DEPARTMENT — NO READINGS AT OR OVER THE ACTION LEVEL.

BLOCK FINISHING DEPT. — TWO (2) OPERATORS HAD READINGS THAT EXCEEDED THE ACTION LEVEL BUT NOT THE POL (TWA). OTHERS CHECKED OK WITH NO READINGS AT OR OVER ACTION LEVEL. ONE (1) OF THE 2 HAD HIS POL (TWA) OVER THE ACTION LEVEL.

RECOMMEND WE REVIEW THE DUST COLLECTION ON THE SKA-442 GRINDERS (PARTICULARLY FINISH GRINDERS) AND PROVIDE A METHODS TRAINING PROGRAM FOR THE FINISHING LINE OPERATORS, ESPECIALLY FOCUSED TO KEEPING PLEXIGLAS PROTECTORS IN PLACE,

Block Finishing Dept. (cont.) — CNC Drill operations was checked on both 2ND and 3RD shifts. Second exceeded the PEL (TWA) and third exceeded the Action Level.

I Recommend that all operators at the CNC Drills be placed in Respirators immediately, a thorough review be made of this work station (Plexiglas Protectors in place and an intensive methods training be provided to those operators with a retest in three weeks. If the reading do not record below the TWA then this work area will become a "Regulated Area,"

Other 3RD shift operator did not exceed the Action Level.

Strip Finishing Department — (17) seventeen operators across all 3 shifts were checked in this Dept. (1) one operator exceeded the "TWA" of 0.2 F/cc. He had one unusually high reading of 1.5 of the four readings taken from him. This occurred at the very start of his day. All other readings were very low.

I Recommend that a thorough review of work practices at the dust & print stations be conducted and a retest of all printer stations (Block & Disc Brake included) be made within 3 weeks. If we still exceed the "TWA" then all printer stations will become "Regulated Areas" requiring mandatory use of Respirators.

(5) operators exceeded the Action Level

STRIP FINISHING Dept. - Cont — FOUR OF WHICH HAD ONE OF THEIR READINGS IN EXCESS OF THE "TWA" OF 0.2 F/CC. (4) OTHER OPERATORS HAD ONE OF THEIR READINGS EXCEED THE ACTION LEVEL BUT OVERALL TWA WELL UNDER THE ACTION LEVEL.

I RECOMMEND A THOROUGH REVIEW OF THE DUST COLLECTION THROUGHOUT THE STRIP FINISHING AREA AND A REVIEW OF WORK PRACTICES. ALSO A RETEST OF ALL OPERATIONS WHICH HAD AT LEAST ONE READING WHICH EXCEEDED THE TWA OF 0.2 F/CC.

GROUPING & INSPECTION DEPT. — NO READINGS AT OR OVER THE ACTION LEVEL.

DISC BRAKE REFORM - DEPT. — (5) FIVE OPERATORS CHECKED ACROSS ALL 3 SHIFTS. EVERY OPERATOR HAD READINGS IN EXCESS OF THE TWA OF 0.2 F/CC WITH TWO (2) OF THEM HAVING OVERALL TWA EXCESS OF 0.2 F/CC AND BALANCE ON HIGH SIDE OF ACTION LEVEL.

I RECOMMEND THAT ALL DISC BRAKE REFORM OPERATIONS BE A "REGULATED AREA" WITH IMMEDIATE REQUIREMENT FOR RESPIRATORS. A THOROUGH REVIEW OF DUST COLLECTION AND CONTAINMENT BE INITIATED AND AN ISOLATION OF RUNNING "ASBESTOS" PRODUCTS ON CERTAIN DESIGNATED PRESSES ONLY! LEADWORK ON BALCONY NEED IMPROVED HANDLING METHODS TO REDUCE THEIR EXPOSURE. A TOTAL "REENGINEERING" OF MIX PRESENTATION TO REFORM NEEDS CONDUCTED.

DISC BRAKE CURING DEPT. — (1) ONE VERY UNUSUAL READING OCCURRED WITH LARRY ISOR ON PRESS #4

DISC BRAKE CURING DEPT. - CONT — WHICH CAUSED A READING IN EXCESS OF THE TWA WITH OVERALL READING OVER THE ACTION LEVEL. OTHER OPERATOR READINGS WERE VERY LOW 0.06

I RECOMMEND THAT LARRY ISOR BE GIVEN A THOROUGH REVIEW OF THE PROPER WORK PRACTICES AND A RETEST CONDUCTED OF HIM IN 3 WEEKS. IF HIS READINGS REMAIN HIGH, THEN A TEST OF EVERY OPERATOR ON NIGHT SHIFT SHOULD BE MADE IN THIS DEPARTMENT AND RESPIRATORS REQUIRED ON EVERY OPERATOR & SERVICEMAN WORKING WITH ASBESTO: DISC BRAKE FINISHING DEPT. — BOTH THE ALTECH DOUBLE DISC GRIND AND THE BONSLOY DOUBLE DISC GRIND CHECKED OVER THE TWA OF 0.2 F/CC EVEN WHEN RUNNING NON-ASB. BORING MATERIAL.

I RECOMMEND ESTABLISHING THE AREA INCORPORATING THE TWO DOUBLE DISC GRINDERS AND THE TIMESAVER GRINDER AS "REGULATED" AND REQUIRE WEARING OF RESPIRATORS. WE NEED TO REVIEW DUST COLLECTION (INCLUDING SHROUDING) PRACTICES AND WORK PRACTICES ON THIS EQUIPMENT. RETEST SHOULD OCCUR AFTER MODIFICATIONS ARE MADE.

SHIPPING DEPARTMENT — ALL SHIPPING DEPARTMENT READINGS WERE BELOW THE ACTION LEVEL,

ALL OTHER DEPARTMENTS — ONLY (2) TWO TESTS OF (17) SEVENTEEN EXCEEDED THE ACTION LEVEL. DUST COLLECTOR SERVICE MAN EARL LARGENT RIGHT AT 0.1 F/CC AND BLOCK Q.C. INSPECTOR, ALLEN SPEELMAN, ALSO RIGHT AT 0.1 F/CC

ALL OTHER DEPARTMENTS (CONT.) — NO OTHER ROADWAYS EXCLUDED
THE AETNA LEVEL.

I RECOMMEND THAT WE OBSERVE BOTH EMPLOYERS WORK
PRACTICES AND DEVISE NEW METHODS OF COLLECTION RATHER
FOR THEM AND THEN RETEST.

OVERALL RECOMMENDATIONS:

ESTABLISH PROPOSED "REGULATED AREAS"; IDENTIFY BY
NAME AUTHORIZED EMPLOYERS WITHIN "REGULATED AREA", ALL OTHER
EXCLUDED; ISSUE RESPIRATORS & ASSIGNED RESPIRATORS, BILLING FOR
UP-KEEP; PROHIBIT (EATING, DRINKING, SMOOKING, TOBACCO & CUM
CONTAINING, AND COSMETICS APPLICATION) BANNED ACTIVITIES IN "REGULATED
AREAS". REMOVE ALL EMPLOYERS IN "REGULATED AREAS" WITH DIS-
CRIMINATE COVENANTS FOR USE OVER RESURVE CEMENTARY.

WE MUST ELIMINATE ALL COMPRESSED AIR NOZZLES THROUGHOUT
THE PLANT SO THAT CLOTHING AND MACHINERY MUST BE VACUUMED
RATHER THAN BLOW-OFF. NITRISK VACUUMS NEED TO BE
PLACED IN ALL DEPARTMENTS FOR THIS PURPOSE.

A COMPLETE REVIEW OF OUR APPROACH TO DUST CONTAINMENT
AND COLLECTION NEEDS TO OCCUR. IT IS MY IMPRESSION THAT
IN MANY INSTANCES WE HAVE CONCENTRATED ON DUST VACUUM
RATHER THAN EMPLOYER RECOMMEND.

I AM READY TO DISCUSS THIS REVIEW WITH YOU AT ANY
TIME.

Respectfully


DONALD P. JOHNSON

Plant Engineer.