

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

PUBLIC HEALTH SERVICE

HEALTH SERVICES AND MENTAL HEALTH ADMINISTRATION

National Institute for Occupational Safety and Health

USPOB, Rm. 521, 5th & Walnut Sts., Cincinnati, Ohio 45202

DATE:

TO : Regional Administrator, OSHA, Region IV
Through: Regional Program Director, NIOSH,
Region IV

September 29, 1972

**PLAINTIFF'S
EXHIBIT**

T-269

FROM : Acting Deputy Director, DFSCI

SUBJECT: Notification of Suspected Violation of OSHA Asbestos Standard

RAYBESTOS-MANHATTAN COMPANY
NORTH CHARLESTON, SOUTH CAROLINA

In January 1971 NIOSH's Division of Field Studies and Clinical Investigations conducted an industrial hygiene survey of the Raybestos-Manhattan plant in North Charleston, South Carolina. The results of the study were forwarded to the South Carolina Board of Health on December 16, 1971.

Average exposure levels in the following jobs exceeded the current asbestos standard of 5 fibers/cc:

- | | |
|------------------|-------------------|
| 1. Mule spinning | 6. Foster winding |
| 2. Ring spinning | 7. Spool winding |
| 3. Spin doffing | 8. Winder fixing |
| 4. Dry twisting | 9. Tape weaving |
| 5. Winding | |

In addition, 46 samples exceeded the peak level of 10 fibers/cc.

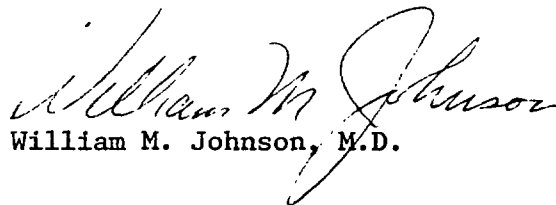
In May 1971 NIOSH's Division of Technical Services responded to a request for technical assistance from the South Carolina State Board of Health for an evaluation of asbestos at this facility. Approximately 165 personal asbestos samples were taken in the textile operations. These samples were to be counted by the South Carolina Division of Occupational Health; however, this agency was unable to complete the asbestos fiber counting due to problems with phase contrast microscopy. Subsequently, the samples have been forwarded to the Western Area Occupational Health Laboratory in Salt Lake City, Utah.

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It is noteworthy that a NIOSH medical survey of February 1971 showed several workers in many asbestos textile operations with restrictive pulmonary function abnormalities, rales, clubbing, and chest X-ray features consistent with asbestosis.

The NIOSH medical and environmental data raise concern about the health status of this plant. Enclosed is the January 1971 air sampling data for your information and evaluation.

In view of the potential serious medical consequences associated with excessive asbestos exposures, would you please inform us of OSHA's follow-up of this situation.


William M. Johnson, M.D.

Enclosure:
January 1971 Sampling Data

cc: Director, DFSCI
Director, DTS
Chief, Industrial Hygiene Services Branch, DTS
Assistant Director for Regional Operations, NIOSH
South Carolina State Board of Health
Commissioner, South Carolina Department of Labor

Raybestos - Manhattan
Charleston South Carolina
Asbestos Textile Plant

U.S.P.H.S. Survey
January 1971
Personal Samples

OPERATION & JOB		SAMPLE #	CONCENTRATION FIBERS >5 μ /cc
100	<i>Fiber Preparation</i>		
	Blender Operator	14	3.8
	Blender Operator	198	7.0
	Blender Operator	197	10.9
	Blender Operator	19	14.7
	Blender Operator	10	6.9
	Blender Operator	196	0.4 ¹
	Stock Packer	1	1.4
	Stock Packer	15	19.3
	Supervisor	17	3.7
110	<i>Carding</i>		
	Card Tender	90	5.3
	Card Tender	104	6.3
	Card Tender	101	4.5
	Card Tender	93	3.7
	Card Tender	200	8.8
	Card Tender	195	10.8
	Card Tender	118	11.2
	Card Tender	102	12.8
	Card Tender	98	12.6
	Card Tender	99	5.1
	Card Tender	86	6.7
	Card Tender	120	4.3
	Card Tender	199	1.9
	Card Filler	234	1.4
	Card Filler	227	7.0
	Card Filler	226	2.0
	Card Filler	225	0.7
	Card Filler	233	0.8
	Stock Roller	96	9.1
	Stock Roller	105	23.2
	Stock Roller	106	7.3
	Weigher (carding)	87	9.7

11/9/71

OPERATION & JOB		SAMPLE #	CONCENTRATION FIBERS >5 μ /cc
120	<i>Spinning</i>		
	Mule Spinner	80	9.9
	Mule Spinner	67	10.8
	Mule Spinner	64	5.7
	Mule Spinner	70	8.4
	Mule Spinner	61	21.6
	Mule Spinner	65	10.0
	Mule Spinner	75	19.3
	Mule Spinner	71	16.3
	Mule Spinner	63	20.2
	Mule Spinner	78	19.1
	Mule Spinner	69	12.6
	Ring Spinner	41	6.4
	Ring Spinner	208	3.8
	Ring Spinner	53	13.5
	Ring Spinner	48	11.3
	Ring Spinner	54	24.8
	Ring Spinner	56	15.5
	Ring Spinner	58	1.0
	Ring Spinner	52	18.0
	Ring Spinner	218	6.7
	Ring Spinner	46	13.6
	Ring Spinner	45	10.6
	Ring Spinner	44	5.6
	Ring Spinner	210	6.5
	Ring Spinner	209	3.9
	Ring Spinner	55	21.2
	Ring Spinner	212	5.2
	Ring Spinner	60	40.9
	Ring Spinner	57	19.7
	Doffer	43	7.5
	Doffer	77	3.7
	Doffer	100	16.0
	Doffer	51	11.1
	Yarn Weigher	50	5.7
	Spool Cutter	47	4.1
	Foreman (mule spinning)	66	18.2
130	<i>Twisting</i>		
	Dry Twister	203	25.3
	Dry Twister	201	12.1
	Dry Twister	95	15.3
	Dry Twister	91	18.0
	Wet Twister	100	8.5
	Doffer	183	3.6
	Twisting Quality Control Technician	92	1.1
	Twisting Quality Control Technician	119	0.5

OPERATION & JOB		SAMPLE #	CONCENTRATION FIBERS >5 μ /cc
140	Winding		
	Winder	205	7.7
	Winder	204	8.1
	Winder	185	0.9
	Winder	79	13.9
	Winder	132	3.7
	Winder	133	7.0
	Winder	184	1.6
	Winder	34	6.8
	Winder	36	0.3
	Winder	130	8.6
	Winder	82	5.8
	Winder	94	7.7
	Winder	84	9.1
	Foster Winder	72	1.8
	Foster Winder	73	12.5
	Foster Winder	74	14.0
	Foster Winder	68	13.8
	Foster Winder	62	12.1
	Packer	175	0.1
	Packer	167	0.3
	Packer	172	2.2
	Packer	178	0.4
	Packer	171	0.3
	Packer	168	0.1
	Packer	177	0.2
	Packer	170	0.1
	Packer	179	0.5
	Packer	162	6.3
	Packer	161	1.8
	Packer	83	9.8
	Packer	176	0.0
	Winder Fixer	134	2.6
	Winder Fixer	16	16.6
	Winder Fixer	12	0.1
	Winder Fixer	9	2.2
	Spool Winder	206	17.9
	Spool Winder	207	10.8
	Winding Supervisor	81	14.6
	Packing Supervisor	180	0.3
	Winding Quality Control Technician	85	2.3

OPERATION & JOB	SAMPLE #	CONCENTRATION FIBERS >5μ/cc
150 Weaving		
Cloth Weaver	115	1.4
Cloth Weaver	186	2.9
Cloth Weaver	127	1.9
Cloth Weaver	126	3.1
Cloth Weaver	124	2.9
Cloth Weaver	187	3.1
Cloth Weaver	189	3.7
Cloth Weaver	125	7.2
Cloth Weaver	123	4.2
Cloth Weaver	135	5.1
Cloth Weaver	137	2.1
Cloth Weaver	114	2.4
Cloth Weaver	113	4.3
Cloth Weaver	110	3.5
Cloth Weaver	140	21.6
Cloth Weaver	122	0.1
Cloth Weaver	217	0.2
Cloth Weaver	181	4.9
Cloth Weaver	211	1.7
Cloth Weaver	213	3.8
Cloth Weaver	121	1.8
Cloth Weaver	202	2.1
Cloth Weaver	190	0.1
Cloth Weaver	111	4.7
Cloth Weaver	108	5.2
Cloth Weaver	107	7.1
Cloth Weaver	219	1.3
Cloth Weaver	182	2.3
Cloth Weaver	215	2.5
Draper Weaver	4	2.5
Draper Weaver	5	2.3
Draper Weaver	7	6.2
Draper Weaver	3	2.9
Draper Weaver	37	1.7
Draper Weaver	38	1.3
Draper Weaver	11	4.1
Draper Weaver	8	3.5
Creeler	216	0.4
Creeler	128	3.4

OPERATION & JOB		SAMPLE #	CONCENTRATION FIBERS >5 μ /cc
150	<i>Weaving (continued)</i>		
	Creeler	138	5.1
	Creeler	136	6.1
	Tape Weaver	220	10.7
	Tape Weaver	39	7.6
	Tape Weaver	40	5.0
	Weaving Inspector	112	6.0
	Weaving Inspector	109	2.2
	Weaving Inspector	117	0.9
	Weaving Inspector	116	0.3
	Foreman	6	4.7
	Foreman	33	9.1
160	<i>Rope, Wick, Braid & Cord</i>		
	Braid Winding Operator	164	1.0
	Braid Winding Operator	163	3.8
	Ring & Braid Press Operator	173	0.4
	Ring & Braid Press Operator	149	0.1
170	<i>Finishing</i>		
	Calender Operator	154	2.4
	Calender Operator	152	2.2
	Calender Operator	151	2.0
	Slitter Operator	160	0.3
	Slitter Operator	142	0.2
	Dryer Operator	153	0.1
	Finish Press Operator	150	1.0
	Inspector	139	2.1
180	<i>Miscellaneous</i>		
	Supply Room Clerk	22	0.2
	Supply Room Clerk	23	0.2
	Sheet Metal Maintenance	30	0.5
	Sheet Metal Maintenance	24	0.3
	Sheet Metal Maintenance	31	0.2
	Sheet Metal Maintenance	28	2.2
	Sheet Metal Maintenance	32	1.8
	Fly Puller	13	2.7
	Fly Puller	129	3.4
	Machine Shop Worker	26	0.5
	Machine Shop Worker	27	1.4
	Machine Shop Worker	21	1.0
	Machine Shop Worker	25	0.3
	Utility Operator	2	1.8

	OPERATION & JOB	SAMPLE #	CONCENTRATION FIBERS >5 μ /cc
180	Miscellaneous (continued)		
	Utility Operator	42	3.4
	Utility Operator	49	8.4
	Utility Operator	141	1.9
	Mechanic	89	17.6
190	New Operations		
	Novatex Operation ²		
	Weaver	232	1.9
	Weaver	222	0.8
	Weaver	223	1.4
	Weaver	224	0.1
	Weaver	221	1.4
	Spinner	191	1.8
	Spinner	192	1.5
	Carding & Extruder	193	0.3
	Carding & Extruder	194	0.2
	Revolite Operation		
	Mixer	239	2.3
	Mixer	240	0.9
	Mixer	238	--- ³
	Revolite Worker	230	0.2
	Revolite Worker	237	11.4
	Revolite Worker	235	0.2
	Revolite Worker	236	1.5
	Revolite Worker	231	0.2
	Revolite Worker	229	1.2
190	Unknown Textile		
	Packing Operator	145	0.5
	Extruding Operator	158	0.3
	Ring Press Operator	156	0.6
	Ring Press Operator	157	0.1
	Ring Press Operator	146	0.1
	Multipress Operator	143	0.2
	Multipress Operator	155	0.5
	Ring Inspector	147	0.6
	Ring Inspector	148	0.6

	OPERATION & JOB	SAMPLE #	CONCENTRATION FIBERS >5 μ /cc
191	Office Workers Industrial Engineer	59	21.3 ⁴

1 Worker on break

2 New process, all operations are wet

3 Background dust too high to get a good count

4 Engineer doing time studies in spinning