FILE NAME: Ford (FD)

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3/5/76

Inter Office

Personnel and Organization Staff

Mr. S. F. Svoboda
Supplier Larson Engineer
Rotunda Evaluation
Service Research Center
Ford Parts and Service Division

March 5, 1976

Subject: Asbestos Dust Vacuum Cleaner Testing

I have reviewed the copy January 6, 1976, Clayton Environmental Consultants report on the Tempo Model 75-D vacuum cleaner. The report and its recommendation are valid. However, I doubt whether an industrial hygiene evaluation during actual use in brake rebuilding is completely necessary, but from a legal standpoint it is probably very desirable.

I believe it is necessary to formalize and modify the test procedure so that a prospective supplier may be aware of our requirements and submit test results from a consultant firm such as Clayton at the time he presents his vacuum for approval.

We have attached a testing procedure that incorporates the Clayton recommendations and modifies the amount of asbestos to be vacuumed.

Henry B. Lick

Henry B. Lick
Senior Industrial Hygienist
Industrial Hygiene Section
Employe Health Services Department

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Attachment

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Ford Motor Company Industrial Hygiene Laboratory Test Procedure

Asbestos Laden Material Vacuum Cleaning Reliability

For Use During Friction Material Rebuilding

The vacuum cleaners shall be tested for effectiveness in a room having a volume of between 750 and 950 cubic feet. This room will be able to be sealed in such a way that the only air movement in the room will be that generated by the exhaust of the vacuum cleaner. The room will further have exhaust ventilation to completely evacuate contaminated air between tests.

The procedure will consist of three test series of ten minutes each. During each test five pounds of asbestos, Johns Manville JM-7T-15 or its equivelent, will be vacuumed from a closed container located at approximately waist height of the vacuum operator. During each test series a breathing zone air sample will be taken from the operator of the vacuum, and, in addition, two general air samples will be taken at opposite ends of the room equidistant from the vacuum. Between each test the room air shall be totally changed and the vacuum cleaner bag changed with notes taken of the condition of the bag, the filters, and the vacuum in general.

Air samples and analysis shall be conducted in accordance with the most current OSHA standard promulgated in the Federal Register that pertains to asbestos exposure. In addition, the vacuum operator should wear respiratory protection suitable for protection to at least ten times the OSHA Threshold Limit Value. Other OSHA requirements such as posting and labeling should be followed.

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Ford Parts and Service Division

March 10, 1976

Mr. D. W. Shaw

cc F. E. Heise
O. M. Julien
P. J. Keegan
S. F. Svoboda

Subject: Rotunda Approval of the Tempo Asbestos Dust Vacuum Cleaner

This is in reference to the Tempo Products Company, January 9, 1976 letter and quotation on an asbestos dust vacuum cleaner. A vacuum of this type should be used in the collection of asbestos material during the servicing of automotive brake systems. Because of the health implications, the equipment must be qualified for external leakage during actual use.

As stated in the January 9 letter, a Tempo vacuum cleaner was successfully tested for asbestos dust leakage by Ford Industrial Hygiene and Clayton Environmental Consultants, Inc. The air sampling procedure and filter analysis were conducted using the methods specified by the National Institute for Occupational Safety and Health. We obtained a similar working prototype machine from the American Cleaning Equipment Corporation. It was submitted to Ford Industrial Hygiene for testing during February 1976. Unfortunately, the unit failed to meet the OSHA threshold limits values (TLV) for leakage of asbestos material. At this point the Tempo has the only machine tested and qualified in terms of asbestos TLV.

At this point, we do not feel that a continued delay for testing of competitive equipment is justified. There is a significant dealer need for a product of this type to use in complying with OSHA regulations. Therefore, we have prepared the attached PNR to add the asbestos dust vacuum to the Tempo purchase order. The revision should be written to include a requirement for production testing on a sample basis.

Thank you for your cooperation in this matter.

A. N. Updegrove

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Inter Office

Ford Parts and Service Division

May 10, 1976

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To: Mr. R. A. Porter

cc: Mr. P. J. Keegan
Mr. A. N. Updegrove ✓

Subject: Corporate Insurance Concurrence of a Rotunda New Product

In late November, Al Updegrove and I met with you in your office to discuss insurance implications of Rotunda products. In particular, we discussed the potential product liability associated with the Asbestos Dust Vacuum Cleaner. This is now a Rotunda item recently added to the product line.

You will recall that the Asbestos Vacuum Cleaner is required to meet OSHA requirements. Breathing of a significant volume of asbestos dust over a prolonged period is believed to be cancerous. Accordingly, we discussed with you the product liability associated with this item, and you requested that you have an opportunity to review a certificate of insurance issued for this supplier.

Such a certificate is attached for your review and concurrence. We appreciate your assistance.

D. H. Donniston

Concur: _____
R. A. Porter

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