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PLAINTIFF'S EXHIBIT
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TO: R. C. Hunt
Hogansville Plant

FROM: L. F. Dieringer
Corporate Industrial Hygienist

DATE: September 1, 1972

SUBJECT: Environmental Monitoring for Asbestos Dust

The week of August 21, 1972 was spent in assisting the Hogansville Plant in a program of environmental monitoring to determine representative airborne asbestos fiber concentrations at the various operations in the Asbeston Plant. A considerable amount of this time was spent with Mrs. Frances Herndon, recently hired as Environmental and Safety Technician to carry out the air monitoring, in acquainting her with the air sampling and asbestos fiber counting techniques employed. A total of 39 samples were collected and counted by Mrs. Hipps, Plant Nurse, Mrs. Herndon and L. F. Dieringer. The asbestos fiber concentrations found are reported in the attached table and plotted on the plant layout diagram both by sample location and concentrations found.

This report contains comments and recommendations based upon the various measurements, discussions and conditions during my visit.

(1) The results of the air sampling indicate that environmental airborne concentrations of asbestos fibers will be influenced by the equipment in operation at the time of sampling, air movement in the building, effectiveness of the exhaust ventilation where applied, and housekeeping. As an illustration, various persons said that the large Carding Machine in the West Card Room disperses a considerable amount of dust and needs to be exhausted. This card was not operating during my visit and asbestos concentration found in its vicinity may not be representative of conditions when this card is operating. Further environmental sampling should be carried out when the large carding machine is in operation.

(2) The asbestos fiber concentrations found indicate that carding, twisting and spinning, operations which involve machine motion and large surface areas, generate the highest airborne concentrations.

At carding, employees must be impressed with the need to keep the exhaust duct opening, especially inside the hoppers, as clean as possible for the exhaust to be effective. Environmental monitoring indicates that the main control efforts should be directed toward controlling dust at these operations.

(3) Although the environmental monitoring did not indicate excessive concentration in this Opening and Blending Room, personal monitoring to date has shown material handling practice produces excessive concentrations. Unless there is a radical change in material handling procedures, it is doubtful that we can comply with the exposure provisions promulgated in the OSHA standard and we should proceed to implement the provision of special clothing, change room, lockers, laundering and posting as required when exposure concentrations exceed the limits.

(4) The asbestos fiber concentration of 24.3 fibers/cc was found during use of the recently installed Scrap Asbestos Baler (Sample 37), exceeds the ceiling concentration of 10 fibers/cc established in the OSHA standard, the ceiling concentration referring to a concentration to which an employee should not be exposed to at any time. The baler is presently sitting in the open in the northeast corner of the storage room next to the Opening and Blending. It is used for baling scrap asbestos from the Wheelabrator unit, and presently involves manual material handling procedures which generate a cloud of asbestos dust which covers the employees. The baler should be enclosed and exhausted and a method developed for emptying the carts into the baler which will eliminate the need to handle the scrap asbestos.

(5) With the employment of Mrs. Herndon, the personal monitoring program should be stepped up. The program will necessarily be slow in starting due to lack of sampling equipment, one sampler available at the moment, a second inoperative and in need of repair, and a third on order. At present time, there is only one battery charging unit for these samplers. At least a second unit will be needed when the three pumps are available, and should be purchased.

To conform to the OSHA requirements, this program should be directed towards obtaining reliable 8-hour time-weighted average airborne concentrations on each employee by December 7, 1972, and every six months thereafter. It is recommended that in approaching this goal that these samples first be obtained on several employees in each of the operations in the plant to determine the operation that presents the greatest concern and to where the greatest control efforts are needed, then working toward time-weighted average samples on all employees by December 7, 1972.

Discussion with OSHA personnel and representatives of other concerns conducting monitoring programs, indicate that they are collecting several samples over the 8-hour working period on each employee to arrive at the

8-hour time-weighted average. The collection of a minimum number of samples per employee over the 8-hour work period will be representative of a more normal work pattern. The actual number of samples necessary over the 8-hour period will depend on the atmospheric dust concentration and its ability to be counted by the microscope.

(6) The present plan to send Mrs. Herndon and possibly Mrs. Hipps to a short course on the membrane filter phase contrast microscopy asbestos fiber counting procedure should be followed through. The National Institute of Occupational Safety and Health (NIOSH) at Cincinnati is in the process of putting together a 2½-day program which will be open to anyone on a first come-first served basis. Discussion with NIOSH personnel indicates it will be a comprehensive course in sampling and counting. Classes will be limited to twelve (12) students. Instruction will be by both video tape and instructor. The hitch is that the first contemplated session will be October 31 through November 2, 1972, with further sessions thereafter according to response. I suggested to Mr. R. Sprayberry that every effort be made to try for the first session. That failing, consideration should be given to the Johns Manville proposal of instruction, which is available at any time.

(7) From observation during my visit, concern arises concerning the effectiveness of the use of respirators. Employees, especially in Opening and Blending and to some extent in Carding, were careless in both how and when they wore their respirators. When not in use, they hung around the employees neck or were stored in such a manner that they could easily be contaminated with asbestos. The WSP prepared by Mr. Sprayberry covering the use of respirators for protection from asbestos fibers and cotton dust, should be implemented after suggested revisions, especially medical limitations in their use, prepared by Dr. J. Wells, are considered.

(8) It is my understanding that as a result of the recent adverse publicity given to asbestos in the various communication medias, that employees are beginning to ask questions about the hazards and their effect upon them. Because of this and their possible knowledge of the forthcoming hearing on another potential asbestosis case, I feel it is important that management inform the Asbeston Plant employees of OSHA requirements and the company's plan to meet or exceed these standards so they understand what is being done and why it is being done as well as allary any fears they might have.

(9) In walking through the Asbeston Plant, I became quite concerned about the visible presence of settled asbestos dust on overhead surfaces, on and under machinery, and on other horizontal surfaces, and adhering to vertical surfaces. In some places, it has accumulated over a period of time. I realize that at the moment the plant does not have the necessary

cleaning equipment and that equipment has been ordered. Such settled dust can easily be disturbed by air currents and vibrations and made airborne again. The disturbance of such settled dust can't help but contribute to higher environmental and personal monitored airborne concentrations.

Every effort should be used to expedite obtaining this equipment as well as overhaul the present inoperable Nilsfisk Cleaner. As this equipment becomes available, an immediate thorough housekeeping program should be undertaken. Until such equipment is available, every means possible within limits posed by OSHA regulations should be utilized to remove the accumulated asbestos dust deposit and improve housekeeping.

It is highly probable that on an OSHA inspection, the plant in its present condition would be cited for being in violation of the housekeeping requirements of the asbestos standard (1910.93 (a) (h) (1).

L. F. Dieringer

LFD:ues
Attachments
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