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UNIROYAL

for → HOGANSVILLE Medical File

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January 19, 1972

Mr. R. P. Sprayberry
Hogansville Plant

Dear Mr. Sprayberry:

Many thanks for making my visit of January 11 to 13, 1972 to the Hogansville Plant an enjoyable one.

The following comments and recommendations are based upon the fiber counting measurements, discussions and conditions noted during my visit.

1. It is recommended that a better arrangement be made for the fiber counting technique to provide a more comfortable counting position, lessen the hazard of jarring or hitting the microscope by placing on a more secure table top, provide for better storage of the sample and fiber counting equipment in one location where there is less chance of damage or breakage, and provide a convenient work space for handling the membrane filter samples and slide preparation

2. As per the emergency temporary standard of December 7, 1971 and proposed amended permanent standard No. 1910.93 a-(d)(6), accumulations of asbestos dust on surfaces, floors and equipment should be removed by vacuuming and the present dry sweeping discontinued.

3. A review should be made of the methods of handling asbestos waste and scrap to insure that it is collected and disposed of in sealed bags or closed containers per 1910.93 a-(d)(5). Attention should also be paid to containment of the waste from the dust collectors which at present is emptied into open carts located under the collector discharge hoppers. Under certain weather conditions, this waste becomes air borne. Such discharges are being prohibited by more and more air pollution regulating agencies. Consideration should be given to enclosure of the hopper discharge area and collecting the waste in sealed bags or closed containers for disposal.

4. After observing the current practice of the wearing of dust respirators in the picking and blending room, questions arise about the effectiveness of the dust respirator program. The employees involved supposedly wear the dust respirators provided when handling asbestos. At other times, it hangs around their neck. From noting the dusty conditions of these respirators and work habits, questions arise concerning their use, cleanliness and maintenance.

OSHA regulation 1910.134 pertaining to respiratory equipment and 1910.93 a-(c) pertaining to exposure to asbestos dust require that where respirators are used, the employer establish a respirator program in accordance with the requirements of the American National Standard Practice for Respiratory Protection Z88.2-1969.

5. In our discussions, questions arose about the sampling frequency and the need for continuing the impinger-dust counting method. With regard to sampling frequency, the proposed permanent standard 1910.93 a-(f), states that the sampling periods shall be of such number and pattern as to represent accurately the exposure of the employees over the working period.

   It is recommended that since we are embarking on a completely new method of evaluating exposure, that sampling be contined on a monthly basis until such time as we can establish our capability for meeting the standard. It is also recommended that we continue the impinger-dust counting for a time to see if there is any correlation between the fiber and dust counts.

6. Initial fiber counting results raise some concern about the ability to meet the current 5 fibers/ml standard at some operations. In this light, management should consider what steps can be taken toward better controls to prevent the escape of asbestos dust and fibers into the work room atmosphere. Steps to consider includes tightening-up operating procedures, improving existing exhaust ventilation systems, employing better housekeeping techniques and getting employees to adopt better work habits.

7. In our current thinking on the future of the operation of the Asbeston Plant, we must keep in mind that there is strong pressure by certain individuals and groups to further reduce the present standard to 2 fibers/ml. Various comments indicate that this reduction is a strong possibility. Some feel it is a certainity, even to the extent of occurring in less than a year.

Very truly yours,

L. F. Dieringer
Industrial Hygienist

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