

Comments on Proposed OSHA Standard
on Workplace Exposure to Asbestos
(49 FR14116, April 10, 1984)

INTRODUCTION

My name is John P. McGinley and I am the Vice President of A-C Pipe Operations for CertainTeed Corporation and a registered professional engineer. As Vice President of A-C Pipe Operations, I have complete responsibility for the manufacturing operations at CertainTeed's two A-C pipe plants, which are located at Riverside, California, and Hillsboro, Texas. My responsibilities also extend to the design and modification of new and existing process equipment for the manufacture of A-C pipe, including all the associated environmental controls.

I attended Drexel Institute of Technology (now Drexel University) from 1952 to 1957, graduating in 1957 with a B. S. Degree in Mechanical Engineering. During the five years that I attended Drexel, I spent approximately six months of each year working in the plants of the Keasbey & Mattison Company, manufacturers of asbestos products, including asbestos insulation and asbestos-cement sheets and pipes.

Since graduation in 1957, I have been working in the asbestos products industry in various capacities—first with Keasbey & Mattison Company, and since 1962, with CertainTeed Corporation.

My first 15 years were in the engineering field where I held positions including machine designer, project engineer, plant engineer, and chief engineer. For four years during this time (1959-1962), I worked exclu-

sively on industrial hygiene projects where I did dust level sampling in the various plants and then designed and installed local exhaust ventilation systems for the various manufacturing processes.

For the past 11 years, I have worked in the A-C pipe manufacturing operation in such positions as plant production superintendent, plant manager, director of manufacturing and presently Vice President of A-C Pipe Operations.

The purpose of my comments is to address some of the technical aspects of OSHA's proposed standard as it relates to the A-C pipe industry. While I am commenting as a representative of the A-C pipe group of the CertainTeed Corporation, I believe my views would generally be supported by my associates at CAPCO and JM--the other domestic manufacturers of A-C pipe.