A57

J. R. M. Hutcheson See page 4

HEALTH, SAFETY & ENVIRONMENT DEPARTMENT
DENVER GHQ
AUGUST 11, 1975

TO: ALL SR. OFFICERS & DIV. GENERAL MANAGERS (101)
ALL OPERATIONS MANAGERS (5111)
ALL PRODUCTION MANAGERS (512)
ALL PLANT AND MINE MANAGERS (52)
OFFICE SERVICE MANAGERS (54)
ALL EMPLOYEE RELATIONS MANAGERS (551)
ALL CONTRACT UNIT MANAGERS (5312)

FROM: W. B. REITZE - DENVER GHQ

SUBJECT: OSHA LETTER NO. 31
USE OF PROTECTIVE DEVICES
RESPIRATORY - HEARING

ALMOST DAILY, INSTANCES WHERE EMPLOYEES ARE NOT WEARING PROTECTIVE DEVICES IN THOSE AREAS WHERE NEEDED ARE BROUGHT TO OUR ATTENTION. THESE INCLUDE AREAS OVER TLV WHERE ASBESTOS, SILICA, LEAD AND SOLVENTS ARE USED AS WELL AS THOSE AREAS WHERE NOISE LEVELS EXCEED PUBLISHED LIMITS.

AS I AM SURE YOU ARE AWARE, AFTER EACH PLANT RECEIVES AN INDUSTRIAL HYGIENE SURVEY, A REPORT IS ISSUED WHICH LISTS ALL WORK STATIONS OVER TLV. PLANTS SHOULD USE THIS REPORT AS A POSITIVE GUIDE TO INDICATE WHEN PROTECTIVE DEVICES ARE NEEDED. IT IS RECOGNIZED THAT BECAUSE OF THE TIME LAPSE BETWEEN SURVEYS, PLANT MANAGEMENT ALSO MAY CHOOSE TO USE PROTECTIVE DEVICES FOR INTERIM PROTECTION.

BELOW ARE RECOMMENDED GUIDELINES INDICATING WHEN PROTECTIVE DEVICES ARE MANDATORY FOR ASBESTOS AND NOISE. THE TLV'S FOR OTHER SUBSTANCES ARE LISTED ON THE INDIVIDUAL PLANT INDUSTRIAL HYGIENE REPORTS.

ASBESTOS: MANUFACTURING, PLANTS, WAREHOUSES, ETC. WHEN INDUSTRIAL HYGIENE MEASUREMENTS INDICATE THE FIBER LEVELS ARE ABOVE 2 F/CC.

ASBESTOS MINES & MILLS (CANADA). WHEN THE INDUSTRIAL HYGIENE MEASUREMENTS ARE ABOVE 5 F/CC.

NOISE: HEARING PROTECTION IS TO BE WORN WHENEVER THE NOISE LEVEL IN A LOCATION EXCEEDS 90 DBA. IF IT CAN BE DETERMINED THAT AN EMPLOYEE IS EXPOSED TO INTERMITTENT HIGHER LEVELS, BUT ON A TIME-WEIGHTED AVERAGE HIS EXPOSURES FOR AN EIGHT-HOUR DAY DO NOT EXCEED 90 DBA, THEN INTERMITTENT PEAKS BEYOND 90 DBA ARE PERMISSIBLE WITHOUT HEARING PROTECTION. IN THESE CASES, THE INDIVIDUAL PLANT INDUSTRIAL HYGIENE REPORT SHOULD BE USED TO DETERMINE WHAT PROTECTION IS NECESSARY.

IT IS REALIZED THAT WHILE MANY TLV NUMBERS DERIVE THEIR EXISTENCE FROM EITHER U.S. FEDERAL LAW OR THE ACGIH STANDARDS, NEVERTHELESS WE HAVE ADOPTED THEM AS OUR CORPORATE STANDARDS, AND AS SUCH THEY ARE TO BE APPLIED TO ALL J-M LOCATIONS--WORLDWIDE.

CURRENTLY OUR ENFORCEMENT OF THE USE OF PROTECTIVE DEVICES HAS BEEN RATHER LAX. REGARDLESS OF WHETHER THERE ARE LAWS REQUIRING USAGE OF PROTECTIVE EQUIPMENT SUCH AS THERE ARE IN THE UNITED STATES OR NOT, IT IS STILL OUR DUTY (AND CORPORATE POLICY) TO PROTECT OUR EMPLOYEES. THIS IS NOT ALWAYS EASY, AND IT IS FOR THIS REASON THAT A. B. MARCHANT WROTE THE ATTACHED BULLETIN DATED JULY 6, 1972 WHICH OUTLINES DISCIPLINARY PROCEDURES TO BE USED IF NECESSARY.

AS MR. MARCHANT POINTS OUT, IT IS THE RESPONSIBILITY OF LOCAL MANAGEMENT TO ENFORCE THE USE OF PROTECTIVE DEVICES. THE LAST PARAGRAPH OF MR. MARCHANT'S MEMO READS AS FOLLOWS:

> "SINCE SAFETY AND HEALTH ARE IMPORTANT FACETS OF EVERY MANAGEMENT POSITION, A SUPERVISOR WHO FAILS TO CONSISTENTLY ENFORCE THE REQUIREMENTS FOR PERSONAL PROTECTIVE EQUIPMENT SHALL BE REGARDED AS HAVING FAILED TO MEET ONE OF HIS MAJOR JOB OBJECTIVES. HIS PERFORMANCE WILL BE JUDGED APPROPRIATELY."

SOME TIME PRIOR TO OCTOBER 1, A NEW LISTING OF APPROVED DEVICES WILL BE ISSUED.

W. B. REITZE

ATTACHMENT.

Published by AsbestosClaims.Law
asbestosclaims.law/library/11984/2