Rec'd 5/28/37

GENERAL ASBESTOS & RUBBER DIVISION

OF RAYBESTOS-MANHATTAN, INC.
ASBESTOS PRODUCTS
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QUOTATIONS SUBJECT TO CHANGE WITHOUT NOTICE. ALL AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS OR DELAYS BEYOND OUR CONTROL.
ADDRESS ALL COMMUNICATIONS TO THE COMPANY

NORTH CHARLESTON, S.C.

May 26, 1937

PERSONAL AND CONFIDENTIAL

Registered Mail
Return Receipt Requested

Mr. Sumner Simpson, President,
Raybestos-Manhattan, Inc.,
Bridgeport, Conn.

Dear Mr. Simpson:-

Subject: Inspection of Plant at North Charleston by U. S. Public Health Service.

You will please refer to the letters as listed below:

Your letter of October 31, 1936 addressed to the writer,
" " " " " " " to Mr. Julian Mitchell,
" " " November 5, 1936 addressed to the writer.

My object in requesting you to refer to these letters is that you will note from same that you granted permission to the U. S. Public Health Service, through the South Carolina State Department of Health, to make an inspection of this plant. You will also note that in said letters reference is made to these Health Department officials making X-ray examinations of our employees. In regard to this, beg to advise that the officials as mentioned above did make an examination of our plant, but did not take any X-ray pictures of our employees.

I am enclosing herewith copy of a letter addressed to myself under date of May 20, 1937 by Dr. R. R. Sayers, Senior Surgeon, Chief, Division of Industrial Hygiene, National Institute of Health, U. S. Public Health Service. I am also enclosing the original of the report which was made by these officials who inspected this plant. I am also enclosing a copy of the report which includes everything except the Process Flow Sheet, Schematic Views of Different Portions of our Exhaust System, and also photographs of our equipment.

I am sending the original copy which was sent me by Dr. Sayers and will be obliged if, after you have read these papers over, you will

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return to me the original copy, along with the photos etc., and keep the duplicate copy to which photos are not attached for your files. I would like to have the original in this office for the use of Mr. Mitchell and myself.

You will now please refer to the letter addressed to me by Dr. Sayers and you will note that in the second paragraph of said letter, Dr. Sayers is requesting that you grant him permission to publish this paper in the official organ of the Public Health Service (Public Health Reports). Now in regard to this, I would suggest that you read over the paper headed "A STUDY OF DUST CONTROL METHODS IN AN ASBESTOS FABRICATING PLANT" very carefully, and there are one or two points which I noted when reading this paper, which I would like to call to your attention.

Number 1.
Note on page 9, first sentence of the second paragraph which reads as follows: "As a measure of the effectiveness of the dust control system in the preparation department, the exhaust fans were shut off for one hour.", then the next sentence in the same paragraph states that under these conditions dust concentrations increased steadily to about 80 M.P.P.C.F. You will note similar statements made in other portions of this report in regard to shutting off the fans in order to see how the dust concentrations would build up if there were no fans in operation, or, in other words, if we did not have a dust system.

At the same time, you will also note that the officials who made the report state that although the fans were shut off; nevertheless, the very effected manner in which we have our cards covered tended to confine the dust.

E. H. Jeffords' opinion as to the data shown under No. 1.
My opinion is that it would be very bad to publish this report with the statements as shown under No. 1 as above appearing in said report, for most of the individuals, who have brought suits against this Company, were working at this plant prior to the time we had succeeded in bringing our dust elimination system up to its present state of efficiency. Of course, you, as well as others who are competent to judge, know that nothing was known of the asbestos dust hazard, in this country, prior to 1928, and you also know that prior to '28 we were already taking steps for eliminating dust for the purpose of making working conditions as pleasant as possible for our employees.

Therefore, as stated above, my verdict is that these remarks in regard to the building up of dust concentrations by shutting off the fans should be eliminated from this report, if same is to be published.

Number 2.
At the top of page 10 you will note the report reads as follows: "This operation is supposed to be performed with both stock car and stock roller outside the bin door. This rule of keeping out of the bins should be strictly enforced. However, stock rollers, wearing respirators, like to push their cars under the chute and then climb into the car and 'tread-down' the stock." In regard to this statement, you have been in the South on one or two occasions and are more or less familiar with the habits of our colored labor. That is, they much prefer to take advantage of every labor-saving device or condition. Therefore, it is very difficult to keep these stock rollers (who are colored men) out of these stock bins. They would much rather go in the stock bin and, as stated in the report, "tread-down" the stock, than to stand outside the stock bin and fork the stock into the car. Orders have been issued in this plant to keep these men out of the stock bins but as soon as the foreman's back is turned, in the stock bin they go.

My opinion as to No. 2.
I think that the remarks in regard to the stock rollers entering the stock bins should be eliminated from the report.

Number 3.
On page 13, third paragraph, there is a statement which reads as follows: "Average Exposures in the first three operations, which were not themselves especially dusty, were due to dust from the twisting operation. With the exception of a trial exhaust system on one twister, the remaining machines were unexhausted." This question of the dust in connection with the twisters has been discussed on more than one occasion with Mr. Fehnel of the Metropolitan Life Insurance Co. and it was decided that until we could invent some method for drawing off the dust from the twisters, we would have to take care of the dust problem by introducing a sufficient amount of fresh air through the openings in the building to "dilute" the air in the room. We have been, and still are, experimenting on some form of equipment which will enable us to remove the dust from the twisters by suction, in the same manner as we handle the dust on other equipment in this plant, but if you are familiar with the construction of a twister frame, you will realize that this is some problem. I do not know of any plant, nor have I ever heard of any plant where the dust from the twisters was taken care of by exhausting same.

Number 4.
Please refer to page 17 under the caption "Conclusion". After reading these remarks carefully, I recollect that sometime ago when the study of dust conditions at the asbestos industries were first being undertaken in this country, certain statements were made as to the size of the

particles and also as to the number of particles per cubic foot, but it seems that in recent years there has been some difference of opinion among the Doctors along these lines, and according to the statements as made under this general heading of "Conclusion", it would appear to me that it has not been, as yet, definitely decided as to the time of exposure to which an individual might be subjected or the conditions to which he is subjected which would cause trouble.

I am submitting the papers as mentioned above, and have also taken the liberty of expressing my opinion, and also I believe that this was a very worthwhile examination, and I greatly appreciate the statements as made by Dr. Sayers. Still, I do not think it would be well to publish this report in its present form. There are certain statements which I feel should be deleted from this report before it is published.

I realize that this is quite a lengthy letter but as I consider this a subject which should receive due consideration by all interested, I am submitting same for your consideration.

I will, as stated in the first part of this letter, be obliged if you will return to me the papers which are attached together, and the first one of which is headed "A STUDY OF DUST CONTROL METHODS BY AN ASBESTOS FABRICATING PLANT".

Yours very truly,

GENERAL ASBESTOS & RUBBER DIVISION
of Raybestos-Manhattan, Inc.
By:

E. H. Jeffords
General Manager.

EHJ:jc
Inc.

CC: MR. MITCHELL