Mr. V. P. Hayes

Speedway Factory

May 9, 1972

Mr. R. W. King
Mr. W. F. Krassick
Mr. L. LaFrance

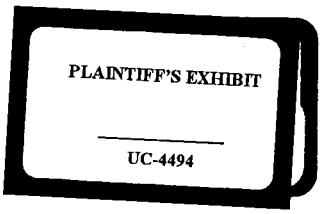
Acetylene Cylinder Filler Processing -- OSHA

On April 18 I spent the morning at the Speedway Factory with Walt Krassick. We took a walk through the plant and I particularly observed the situation as regards asbestos and silica dust in the acetylene cylinder filler processing area.

I know that you and Walt and others at Speedway have been well aware of the dust problems at that location and of the desirability of doing something to alleviate them. However, I do think it is in order to point out that OSHA standards of allowable exposures have been reduced and may go even lower. Should the Speedway Factory be subjected to OSHA inspection I feel it is almost certain that they will land on us very heavily for the conditions in the filler processing area.

Mr. Leo LaFrance, corporate industrial hygienist, was at Speedway June 7 and 8 last year, and you received a report from him dated July 16. On pages 3 and 4 it covers this particular situation and recommends better exhaust control and building clean-up. Samples taken at that time both as to asbestos and silica were a good many times above the allowable levels of the standards that then existed. This was true not only when dumping took place on the loading platform, but also with respect to background dust levels on the platform and on the main floor of the building. I realize that the dumping operation involves a time span of only about 15-18 minutes, once per shift, on the average. However, as noted, the background levels were still quite excessive.

At the time of Mr. LaFrance's 1971 survey the basic OSHA standard on asbestos set a limit of 12 fibers per milliliter. Because of Federal authorities concern for the health of workers handling asbestos, an emergency standard was issued on December 7, 1971 dropping the basic figure to 5 fibers per milliliter---making us even farther out of line. For your information a copy of pages 23207-8 from the Federal Register of last December 7 are attached. (Walt Krassick received a copy some time ago from Tom Willoughby.) Leo LaFrance now tells me that there is further consideration of whether to keep the figure



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