PLAINTIFF'S EXHIBIT

UC-5100

OSHA/ASBESTOS HEARINGS
ORAL TESTIMONY OF ROBERT J. KRONKHYTE

July 10, 1984

I. INTRODUCTION

My name is Robert J. Kronkhyte and I have worked as safety engineer at the King City, California operation. I have been the individual chiefly responsible for the design and implementation of the respiratory protection component of King City's overall health and safety program.

My experience in the use of respirators began when operations started at King City in 1963. For the first eight years I worked as a shift supervisor. I oversaw a crew of seven employees, trained them in production and safety, and wrote shift and safety reports. In 1971 I was promoted to maintenance supervisor. My responsibilities included managing the warehouse, maintaining the asbestos mill, and supervising the production and safety of eight maintenance mechanics and a warehouseman.

From 1971 to 1984 I also served as King City's safety engineer. This job required that I learn and oversee plant-wide industrial and mining safety, the economic and regulatory aspects of King City's safety program, and off-the-job safety. From this position I enjoyed a great deal of flexibility to design and implement safety programs for King City.

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In 1973 I advanced from maintenance supervisor to mill foreman. There I planned and managed plant production, distribution, and laboratory operations. My work force comprised up to 35 hourly employees and five front-line supervisors. In 1984 I resigned from my position as mill foreman and safety engineer at King City to become safety supervisor at Kaiser Refractories in Moss Landing, California. Since this change occurred only last month, this testimony may sound like I'm still employed at the King City operation. I am not authorized to speak as a representative of my former employer.

These jobs have afforded me full and varied exposure to the use of respiratory protection. Since operations began in 1963, I have worn a respirator where such use is required and in areas where we do not require but do encourage such use. As shift supervisor, maintenance supervisor and mill foreman, I worked alongside my work force and thus was able to monitor respirator use. In addition to visual oversight, I have been required to file routine safety reports which included results from inspections. As safety engineer I conducted unannounced spot-checks of respirator use and other safety items several times per day.

As safety engineer I implemented the respiratory protection portion of King City's general health and safety program. In this capacity, I have encouraged the personal

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involvement of the employees in program design and implementation where appropriate. I have incorporated the results of our efforts into King City's approach to respirator protection.

II. THE USE OF RESPIRATORS AT KING CITY

A. Respirator Areas

As Mr. Myers pointed out, we require respirators to be worn in certain areas generally for the purpose of providing supplemental worker protection beyond that afforded by compliance with applicable PELs. These areas include the bagging area and certain operations involving the handling of dry asbestos. We also strongly encourage respirator use in other areas. We continue to monitor for airborne asbestos on a monthly basis in areas where respirators are required to be worn and every 2 to 3 months in other plant areas. Signs are posted that clearly denote the areas where respirators are required to be worn.

B. Selection of Respirators

As already mentioned, one way in which we have achieved broad employee acceptance of the respiratory protection program is by involving employees in the selection of respirators approved for asbestos. It has long been our operating premise that when we afford employees a choice among such respirators and get them personally involved in the details

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of the program, they are more likely to achieve a proper fit and wear them. From 1963 to 1973 we provided #600A Wilson Monomask respirators to all employees. In 1974 we switched to Welsh 7165 and 7170 models, which employees told me afforded an improvement in fit and comfort over the respirators we had used previously. This program where employees participated in the selection of respirators began in 1981. As you can see from Attachment C to the outline of my testimony that was submitted June 18, a wide variety of approved respirator brands and models were evaluated. Following their lengthy evaluation the employees decided to continue to use the Norton quarter-mask negative pressure air purifying respirator.

Since then we have offered the single-use and reusable models of this respirator to all employees although most of them prefer the single use type. In addition, we inform employees that we can obtain other respirators for their use if they are unable to achieve a proper fit or adequate comfort using one of the Norton respirators.

C. Physical Fitness to Wear Respirators

As part of our pre-employment medical examination, prospective employees are evaluated with regard to their ability to perform work while wearing a respirator. The annual medical examination provides for an ongoing evaluation of an employee's ability to use a respirator. Duri[illegible]

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the term of my employment at King City, no employee who has passed this initial screening test has been unable to work effectively while using a respirator.

D. Field Fit-Testing

In addition to testing for physical fitness to work while using a respirator, we take steps to assure a proper fit. We require that facial hair be trimmed to permit a proper face seal. We fit-test by instructing the wearer to plug the air valve and exhale. In this way the tester and the employee can determine whether the seal is proper. We require all employees to fit-test their respirators daily.

E. Training

When an employee is hired, he undergoes twenty-four hours of MSHA safety training. This training includes a variety of instructions concerning the use of respirators and is based on a comprehensive respiratory protection manual. See Attachment B to my June 18 outline. Each new employee views a videotape in which another employee explains and demonstrates the proper use of respirators. In another videotape our plant's physician, Dr. Hyde, explains the reasons for using respirators and the nature of the health hazards related to asbestos exposure. The videotape is accompanied by face-to-face instruction by fellow employees who have advanced to supervisory positions. Interpreters

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are used where needed. From the time that an employee first comes to work at King City, he/she participates in formal respiratory protection training on an annual basis. Supervisors at all levels of the King City operation join in this training and receive further instruction through mandatory in-house seminars and outside safety programs.

F. Monitoring and Supervising Respirator Use

New employees are assigned to a shipping/labor crew where respirators are required for certain jobs involving the handling of dry asbestos. Their next assignment would ordinarily be working full shifts in the bagging area where respirator use is mandatory at all times. Even when employees advance to other positions where respirator use is not required, they have become accustomed to them and usually continue to wear them for extra protection. Most supervisors are promoted from the hourly payroll and therefore provide a good example in using respirators themselves and know how to monitor the use of respirators.

We rely heavily on this system of promotion from within knowledgeable for the administration of the respiratory protection program. Nevertheless, a variety of supervisors monitor the use of respirators in any given area. The mill foreman and his assistant conduct random spot-checks and include their findings in daily safety reports. Each shift supervisor remains in the presence of his work force throughout

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respirator use is encouraged but not required, nearly all employees wear their respirators at least 80 percent of the time.

Moreover, employees have succeeded in overcoming any impairments to oral communication related to the use of respirators. Even in areas where noise exceeds 60 decibels, employees remain in contact through the use of mechanical buzzers and handsignals which they developed at the plant. These methods have helped King City employees to avoid any on-the-job accident in connection with the use of respirators.

That concludes my statement. I would like now to turn the presentation over to Mr. John Pritchard, who will address the respirator issue more broadly.

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