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June 9, 1981

BY HAND

Mr. John F. Welch
Director, Public Affairs
A/C Pipe Producers Association
1600 Wilson Boulevard
Suite 1008
Arlington, Virginia 22209

Dear John:

Following up on our discussion last Friday, I have drafted outlines of two position papers to be prepared for EPA. I have also looked through our files to begin identification of already existing documents on the subjects to be covered. I enclose both the outlines and documents.

Position Paper on Manufacturing Dust Control

Both monitoring information and the technological feasibility of improved dust control have previously been discussed by Weston and RTI. My outline follows the same general pattern as those discussions. Much of what we need to do now is to update (and correct as necessary) those previous discussions.

Beyond presenting current monitoring data that we should be able to obtain from the forms already filled-out at ORC, our major task will be to discover the extent to which the improved dust control techniques and equipment discussed by RTI have been put into place and the extent to which additional use of such procedures is viable.

I would guess that the best means of attacking the problem would be for us jointly to write the position paper, circulate it to the relevant persons in each of the three companies and then convene a meeting to get their ideas and agreement to the paper. We would then be in a position to transmit

it to EPA. The paper should satisfy both their desire for monitoring data and their request that we seek ways to further improve in-plant dust control.

Position Paper on Installation Exposures

The points that EPA is most interested in knowing are:

1. How often are abrasive disc saws used in pipe installation?

   What we would optimally like to be able to say is that x miles of pipe are laid each year, that y operations per mile require operations that might require disc saws, that disc saws are used in z% of those operations (meaning that 100-z% of the operations are done without saws in accordance with work practices). Further, we would like to be able to say that in order for such disc saw operations to occur, x men spend a grand total of y hours per year employing disc saws. (Such a calculation would be good for risk assessment when combined with known exposure numbers for such operations).

   At the same time, we should probably canvas other pipe installation practices that may lead to fiber release (including perhaps pipe tapping leading to release of fibers into the water).

2. What factors distinguish contractors who use abrasive disc saws from those who use approved work practices?

   The underlying issue is how to get all contractors to use approved work practices. If we can identify the contractors who do not and discover why, we can work with EPA to come up with a program to promote (or require) use.

My outline comprehensively covers all operations performed during installation. It may be unrealistically long in that some operations may rarely be used, and some may emit so few fibers as not to be worth exploring. Nonetheless, it may serve as a starting point.

A similar effort was attempted once before by RTI (pp. III-23 to III-24). They concluded that average worker exposures to cutting and machining operations for the 59,000 workers is between 1.38 and 9.6 hours per year. If those are realistic figures, we certainly should be able to assure EPA that installer asbestos exposures are not very substantial.

We should discuss what steps we should take to obtain the information necessary to put together this position paper.

I suggest we get together again on your return from St. Louis.

Yours truly,

Timothy S. Hardy

sdl

Enclosures

cc w/o encs.: Mr. Pigg

OUTLINE OF POSITION PAPER ON A/C PIPE PRODUCTION DUST CONTROL

I. INTRODUCTION

A. Number of plants

B. Number of workers

II. DESCRIPTION OF THE A/C PIPE PRODUCTION PROCESS, DUST CONTROLS IN THAT PROCESS, AND RESULTING FIBER MEASUREMENTS

1. Fiber Receiving and Storage (current packaging, handling techniques)

2. Fiber Introduction (local exhaust systems, bag disposal methods)

3. Dry Mix (local exhaust systems)

4. Wet Mix (local exhaust systems)

5. Pipe Formation (good housekeeping)

6. Curing (good housekeeping)

7. Finishing (local exhaust systems, single-point cutting tools)

8. Coupling Cut Off and Machining (local exhausts)

9. Fitting and Specialists (local exhausts, wet processing)

10. Rework Saw and Crushing (local exhaust systems)

11. Hydrostatic Testing (recycled water)

III. FEASIBLE IMPROVEMENTS IN A/C PIPE PRODUCTION PLANTS (Are any of these viable?)

1. In Fiber Receiving and Storage

   a. Pelletized Fiber?
   b. Compressed Block Fiber?
   c. Automatic Bag Opening?

2. In Fiber Introduction

   a. Automatic Bag Opening Machine?

3. Eliminate Dry Mix?

4. In Finishing

   a. Wet Dust Suppression?
   b. Redesigned Machinery?
   c. Automated Equipment?

5. In Coupling Cut Off and Machining

   a. Wet Processing?

OUTLINE OF POSITION PAPER ON
ASBESTOS EMISSIONS DURING A/C PIPE INSTALLATION

I. GENERAL DATA ON A/C PIPE INSTALLATIONS

A. Sewer Pipe

1. Number of Miles Laid/Year
2. Where Its Laid in Order to Provide Data for Number of Operations Performed/Year

a. Cutting
b. Machining
c. Hole Cutting
d. Tapping
e. Coupling Removal

B. Water Pipe

1. Number of Miles Laid/Years
2. Where Its Laid in Order to Provide Data for Number of Operations Performed/Year

a. Cutting
b. Machining
c. Hole Cutting
d. Tapping
e. Coupling Removal

II. OPERATIONS IN A/C PIPE INSTALLATION THAT MAY EMIT FIBERS

A. Cutting Operations (for each -- how often used and with what fiber release)

1. Hack Saw
2. Snap Cutter
3. Abrasive disc, wet
4. Abrasive disc, dry
5. Hammer, chisel and rasp

B. Machining (for each -- how often used and with what fiber release)

1. Manual Field Lathe
2. Power Lathe
3. Doty Machine

C. Hole Cutting (for each -- how often used and with what fiber release)

1. Power-operated equipment
2. Drill, hammer and rasp

D. Tapping (for each -- how often used and with what fiber release)

1. Mueller J. Tool (dry tap)
2. Mueller B-100 Tool

E. Coupling Removal (for each -- how often used and with what fiber release)

1. Hammer and chisel

III. CALCULATIONS OF AVERAGE ANNUAL EXPOSURES AND NUMBER OF PERSONS THUS EXPOSED