PLAINTIFF'S EXHIBIT
MON-2359

Monsanto

FROM (NAME & LOCATION) J. M. Harris - Chocolate Bayou Plant

DATE August 8, 1972

SUBJECT Use of Asbestos at Chocolate Bayou

REFERENCE

TO E. N. Brasfield

cc A. W. Adams
R. E. Belden
B. R. Bradshaw
H. C. Clark
F. H. Dupre
C. H. McComb
R. L. Miller - O.M.C.

Since the O.S.H.A. has been enacted, the following activities and plans are in progress at Chocolate Bayou concerning insulation.

1. A study has been completed on what types we use. It is estimated that approximately 60% of all insulation used in the plant contains asbestos. (See attached memo.)

2. A request has been issued to Engineering Services to determine the feasibility of eliminating the use of asbestos at Chocolate Bayou. In turn, Engineering Services referred the study to R. L. Miller of St. Louis. Information received indicates St. Louis is to issue a standard bulletin describing suitable alternates.

3. O.S.H.A. approved respirators have been purchased for the insulators and are in use.

4. The fabrication saws in our insulation shop have vacuum exhausts in operation now. A dust collection system for these saws outside the buildings is in the planning stage, with completion expected September 1, 1972. The feasibility of installing a vacuum system above the saws is also being evaluated by our group.

5. A vacuum cleaner suitable for clean-up in the fabricating shop is being sought.

6. Special clothing (coveralls) requirements are to be dealt with as follows:

   a) Fabricating man in the shop would require clothing.

   b) Only major removal jobs in the field would require coveralls, such as: stripping of an exchanger head or shell. Removal of insulation on flanges or for a tie-in would not warrant the use of special clothing.

c) Any large fabrication in the field where sawing and fitting is required would apply.

7. Caution signs and labels, as required by the standard, have been purchased and installed.

I feel that any mechanical item or facility revision required should be provided by Monsanto. Other items required in the standard should be complied with by the contractor. Some of these are:

1. Monitoring for exposure to asbestos every six months.

2. Medical examinations at the beginning and end of employment.

3. Setting up program for maintaining respirators as per A.N.S.P.R.P. #288.2-1969.

4. Enforcing work habits as per requirements outlined in the standard.

The Safety Department would appear to be the most likely source for monitoring the asbestos concentrations in our operation.

Through our Purchasing Department, we have received information from the Owens-Corning sales representative (manufacturer of KayLo) that by the end of 1972 they will have an insulation on the market that will exceed KayLo in every respect. It will be asbestos free. B. R. Bradshaw is working with our Texas City plant on securing a sample of this material.

Based upon corporate and Federal Government guidelines to date, I feel the approach would be as outlined. To rush into a program that would cost great sums of money to revise our facilities and methods of fabrication at this time, is not considered necessary in order to comply with the intent or spirit of the new law.

Any comments or suggestions would be appreciated.

J. M. Harris

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