INTER-OFFICE MEMORANDUM

TO G. P. Fleming
AT Safety

DATE February 22, 1972

FROM K. R. Blevins
AT Fabrication Engineering

COPIES TO
F. J. Auth
W. L. Cooper
H. M. Darnell
J. H. Hopper
W. A. Kapfer
L. G. McDaniel
R. Sears
K. A. Shaw
E. E. Stephenson
T. J. Walker - 955 KB
J. L. Watkins

SUBJECT Emergency Asbestos Standard - OSHA

At your request, the following information is given in reply to T. J. Walker's memo of December 28, 1971, concerning the Emergency Asbestos Standard dated December 7, 1971:

1. Measurements of airborne concentrations of exposure to asbestos: Measurements have never been made for exposed areas in the Fabrication Plant. By copy of this letter, we are requesting that K. A. Shaw make arrangements to sample and analyze the concentrations in the Casting Department Mason Shop when asbestos shorts are being mixed in refractories. It is requested that this work be completed by April 1, 1972.

2. Amount of asbestos used per annum in the Fabrication Plant:

   a) Asbestos shorts - less than 10,000 lb. (The entire Ravenswood Works purchased 60,000 lb. of asbestos shorts in 1971 but most of this material is used in the Reduction Plant).

   b) Asbestos wick packing - 60 lb.

   c) Asbestos furnace seals - 342 feet.

   d) Asbestos cement - 450 lb.

   e) Asbestos gaskets - 524.
   In addition to the above materials for which quantities are available (year of 1971), there are other uses in the Fabrication Plant:

   f) Asbestos aprons for fire protection (limited personal contact).

   g) Asbestos insulation on thermocouples.

   h) Asbestos blankets for heat protection while working in hot areas.

   i) Pipe insulation with an asbestos content.

PLAINTIFF'S EXHIBIT tabbies IUV-007020

PLAINTIFF'S EXHIBIT tabbies 42512.00

3. Description of the manner in which asbestos is used: As indicated above, the largest single use of asbestos in the Fabrication Plant is in the form of asbestos shorts. The shorts are used as part of the refractory mix for the lining of D.C. troughs in the Casting Department. They are also used in plugs in the Rotary Skim Furnaces.

4. Whether respiratory protection is available and is used: Facemasks are available in the Casting Department, and are used by personnel, although it is believed that usage is much less than 100%.

5. Whether hand and/or power operated tools are ventilated: No.

6. Description of engineering controls or material handling methods used to control exposures: The mixer that is used to mix the asbestos shorts mortar in Casting is equipped with a hood and exhaust fan.

RECOMMENDATIONS

The following recommendations are made to allow the Fabrication Plant to comply with the new asbestos standards:

1. Although no sampling has been done to date, it is suspected that we exceed the permissible limit in some areas, particularly those areas where asbestos shorts are used. Rather than installing elaborate and expensive ventilation equipment, it is recommended that we eliminate the use of asbestos shorts where possible. For example, Masonry supervision has advised us that brick could be substituted for the asbestos mix in the Casting troughs. Upon your approval, an engineering project will be established to redesign the troughs to accept brickwork.

2. According to the standard, all hand and power tools which produce asbestos dust must be provided with local exhaust ventilation and dust collectors. Asbestos cement must be mixed in closed bags or containers; waste and scrap must be collected and stored or disposed in closed bags. All clean-up work must be done with vacuum cleaners - no hand sweeping is allowed. It is anticipated that new tools will be necessary to comply with this section of the standard. Please advise the writer if Engineering help is required in the selection of the new tools or if RFI funds are required.

3. It is recommended that the specifications of the respiratory protective devices now in use be checked to determine if they are adequate to meet the new standard. Also, according to the standard, these devices must be inspected regularly, and must be cleaned, stored and repaired properly.

4. The importance of wearing respiratory protection when working in an area where asbestos dust is present should be stressed through safety meetings or other communication.

KRB/11