M. J. VAUDREUIL

PITTSBURGH OFFICE

MR. G. D. HICKS

MASSENA OPERATIONS

1979 August 28

PLAINTIFF'S EXHIBIT
AL-355

RE: PRIORITIZATION OF INDUSTRIAL HYGIENE RECOMMENDATIONS

During our meeting with Reid Clark, it was decided that we should list our recommendations in order of their priority. In this way, those items of greatest consequence will receive the most prompt attention.

In reorganizing the list, I have given consideration to the probability of citation, seriousness of the health hazard, and feasibility of correction. You will notice that some of the initial recommendations are not included in this revision. I have incorporated only the most important items.

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1. Asbestos - The asbestos usage situation will most certainly result in an OSHA citation. Inasmuch as we cannot eliminate all applications of the material, we must comply with the appropriate requirement of the OSHA asbestos standard (1910.1001).

2. Respiratory Protection - Respirators are routinely worn throughout the works. On occasion, some respirator users are exposed to levels of total dust and fluorides in excess of the OSHA TLV's. In order to provide maximum protection for the worker, we must have a written and active respirator program.

3. Ingestion of Toxic Substances - Heating and/or storage of food on pots, baking furnaces, and other contaminated areas cannot be permitted. Food must be stored and consumed only in lunchrooms to minimize the ingestion hazard to employees.

   Reid Clark stated that he has already authorized the renovation of lunchrooms to include air conditioning. I might add that all lunchrooms in Tennessee are air conditioned, provided with microwave ovens and cleaned daily.

4. Exhaust Ventilation - A comprehensive preventive maintenance program is needed. Many of the dust and fume collection systems at Massena have problems with fugitive emissions. Problems include open doors, missing ducts, incomplete hooding, etc. A good P.M. program could eliminate many of the problems.

5. Material Handling and Storage - Much of the airborne dust at Massena is due to material handling techniques. These include the use of improper boxes for unloading bath, excess storage at the bath crusher, and leaky ore filling stations. Citations for overexposure to total dust and fluorides are expected.

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I understand that steps have been taken to alleviate the storage problem at the bath crusher. Reid Clark also informed us that the ore filling stations are to be redesigned. These changes should greatly help the situation.

I have tried to group the more important items which are in need of fairly prompt attention. Although the remaining recommendations represent good industrial hygiene practice and would result in an improved work environment, they should be given low priority. They most probably are not OSHA violations, and may pose feasibility problems.

In reference to the recommendations about sweeping machines in the initial report, I had the opportunity to observe sweeping practices in Tennessee. Although similar machines are used, they are fitted with an enclosure around the rotating brush. This steel and rubber hood extends to within an inch of the floor and is fitted with an exhaust hose. These machines generated far less dust than Massena's sweepers. I should have some photographs to send you shortly.

If I can be of any further assistance, please feel free to call me.

M. J. VAUDREUIL

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