

**HALETHORPE EXTRUSIONS, INC.
ASBESTOS MANAGEMENT PROGRAM**

October 1997

**PLAINTIFF'S
EXHIBIT
AL-1297**

ALCOA ASBESTOS MANAGEMENT REQUIREMENTS

Halethorpe Extrusions, Inc. (HEI) will follow the Alcoa Asbestos Management Procedure and Alcoa Engineering Standard 18.18 (Asbestos Removal Standard).

IDENTIFICATION OF ASBESTOS

Asbestos containing materials have been used throughout the plant, mainly for insulation of pipes/ductwork and furnaces/ovens, floor tiles, and mastic associated with floor tiles and baseboards. The EHS Manager maintains an inventory of locations that are known to contain asbestos containing materials (ACM).

Copies of the current asbestos survey conducted by Dames & Moore are included in the HEI Environmental Manual. Copies of this manual have been distributed to the Location Manager, EHS Manager, Process Manager, Product Manager, Maintenance Manager, Manager of Business Analysis, and the environmental consultant.

Galbestos is suspected to be present in some roofing and siding materials. A survey of possible galbestos materials will be developed by the end of 1997.

COMMUNICATION OF THE PRESENCE OF ASBESTOS

All employees receive hazard communication training in each department on an annual basis. This program identifies how an individual can obtain information of any chemical at HEI and who to contact for concerns. Asbestos will be discussed in these meetings and may be a topic for individual plant safety meetings.

INSPECTION PROGRAM

Quarterly inspections of ACM at HEI will be conducted to evaluate the condition of areas of the plant with ACM. These inspections will be conducted by the EHS Manager, the Process Manager, and/or the environmental consultant. These inspection findings will initiate actions for remediating damaged or friable ACM.

Every 3 years an asbestos survey will be developed with cooperation from the landlord. The next survey is due to be conducted by year-end 1999.

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PROCUREMENT REQUIREMENTS

No asbestos containing materials are to be purchased for HEI.

All records must be maintained for a minimum of 30 years.

EMERGENCY PLANS

In the event of a spill or release of ACM into the environment, HEI emergency notification procedures in the RPCC Plan and the HEI Environmental Manual will be followed.