

FILE NAME: RT Vanderbilt (RTV)

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DOCUMENT DESCRIPTION: Report - Removal of 300 Bags of MOULDENE Talc
From Armstrong Mold Co.

Note to the File

Removal of 300 bags of MOULDENE Talc From Armstrong Mold Company - Syracuse, NY

On May 2, 1992 I visited Armstrong Mold Company to observe the removal of 300 bags of unused "Mouldene". Because this discontinued talc product had been improperly labeled as asbestos containing, a licensed abatement contractor was retained by the owner of this material to remove it from his premises as an asbestos containing material. Rather than bear the analytical costs involved in proving this material contains no asbestos and was mislabeled, it was decided to handle this material "as though it did" contain asbestos in the interest of cost containment.

Overseeing this removal project was Mr. Alan Avrigh, who serves as the owner's occupational health and safety consultant. Mr. Avrigh is licensed to oversee projects of this nature and was responsible for retaining the removal contractor and obtaining all state required certificates and the burial permit. As per standard operating procedure (mandated), this removal project involved the following basic steps:

1. Each paper Mouldene bag was placed in a prelabeled plastic bag and sealed after torn bags were patched with tape.
2. The removal contractors wore the typical removal gear (i.e. full body coveralls and respirators). The area was properly vacuumed after the work.
3. Double wrapped bags were placed in a covered box trailer and taken to a secured landfill for burial in West Virginia.
4. During and after the bags were removed from the owner's warehouse, air samples were taken to confirm the absence of residual contamination in the warehouse area.

Prior to the rebagging, I inspected the bags and found about 5% to be in poor condition (some bags were torn). There was some evidence of spillage in the warehouse area. I took a sample from one of the bags to hold in the event future inquiries develop. This sample is labeled "K-100 (Mouldene)" and shall be filed with this record.

The removal project went smoothly and took approximately three hours. A listing of participants, phone numbers and license numbers was partially obtained on the removal date. A more complete listing shall be forwarded with the bill and retained in our files.

There was no evidence of any "hidden" agenda. I spoke with the owner of the metal casting facility who was not in the least concerned. In fact, Mr. Armstrong asked about the possible use of our talcs or our wollastonite in new processes he was considering (I left Randy Johnson's name and number for follow-up in that regard). The removal activity took place after work hours, there were no spectators, inquiries or any sign that this was anything other than a straight forward removal/disposal effort.

John W. Kelse
Corporate Industrial Hygienist
May 4, 1992

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