FROM W. J. DRAKE

ROCKDALE WORKS

TO MR. J. L. DIEDERICH

PITTSBURGH OFFICE

1989 March 6

PLAINTIFF'S EXHIBIT AL-97

RE: ASBESTOS

Rockdale has an intensive program to control exposure to asbestos in all known asbestos containing areas of the operations. Surveys to identify asbestos are complete in the Smelter and in the Mines except for pre-1980 built-up roofing in the Smelter and pre-1980 ceilings in the Mines. Over the next six months we will develop cost estimates and replacement programs to eliminate asbestos in these areas.

The Power Plant, however, is a much larger problem. There are major quantities of asbestos throughout Units 1,2, and 3. Texas Utilities is proceeding with an asbestos program but it will probably be several months before the full extent of the problem and cost of replacement is known. We will expedite the program where possible and will take every opportunity to eliminate asbestos material where economically possible during maintenance.

W. J. DRAKE

WJD:ak
Attachment
Copies: R. C. Rawe - Pittsburgh
R. R. Taylor - Pittsburgh

BC: C. L. Green - Rockdale
~~G. H. Lentz~~/E. B. Parker - Rockdale
G. C. Kraft - Rockdale
J. T. Hill - Rockdale
W. T. Eckert - Rockdale

ARD 004028

ALCOA

SF-4563 (REV 11-68)

FROM G. H. LANTZ

ROCKDALE WORKS

TO W. J. DRAKE

ROCKDALE WORKS

1989 March 06

RE: ASBESTOS

You asked me to coordinate a response to Mr. J. L. Diederich's letter requesting a summary of:

1) Are we complying with asbestos regulations? and
2) Are we being proactive in dealing with the issues before they become potential problems?

1. We are not in violation of any regulations. The Texas Air Control Board is notified prior to removal of any asbestos material. The removal work is performed only by qualified outside contractors. The contractors must provide a written report covering his activity, proof of medical examination for each of his employees, asbestos exposure-monitoring results, and a description on how the work was performed. The bagged asbestos material is then placed in an approved asbestos waste disposal area and buried within 24 hours. The Power Plant program is the same, but their program is administered by Texas Utilities.

2. The status of our asbestos program is:

Smelting Plant

A complete asbestos survey is in progress covering the entire Smelting Operation. This will be complete by March 31. The major sources of asbestos are steam/water line insulation, (approx. 13,000 ft identified); 1500 ft. of Flamastic coating on cable trays in 12 equipment control rooms; three steam boilers; and insulation in two ingot furnaces scheduled for rebuild in 1989. We plan to use this survey to assess the magnitude of the problem and develop a plan to systematically remove asbestos from the plant. In the meantime, asbestos areas will be relabeled to prevent exposure. The only area not tested for asbestos yet is built up roofing in pre-1980 buildings.

Mining

There are only a few minor areas to be checked for asbestos in the mining area. There are a few pre-1980 buildings to be checked for ceilings etc., and these will be scheduled upon completion of the Smelter survey.. The only known asbestos exposure is brake relining in the vehicle repair shop. Exposure testing will be done the next time this work is performed, but exposure is expected to be well below OSHA standards. Elimination of asbestos from the mining operation should not be a large problem and will be done.

ALCOA

SF-4563 (REV 11-88)

Sandow Units 1,2,&3

Units 1,2 & 3 have a vast amount of asbestos insulation throughout the steam piping systems, boiler side wall/roofs and in the dryer complex.

There has not been a program initiated to replace the asbestos in a logical planned manner. Current activities are limited to identifying the asbestos, mapping the entire plant and labeling those areas which contain asbestos. TUE has been asked to generate a cost estimate for total replacement of the insulation.

Texas Utilities is currently responsible for the mapping program and the asbestos abatement program. Asbestos installation is replaced only as necessary to support maintenance and overhaul activities. Removal and abatement programs are performed in accordance with existing regulations.

Major rework of the boiler casing and roofs are planned for 1990, 1991, and 1992 and the asbestos insulation could be replaced in these areas as part of the work. No major steam piping or dryer asbestos insulation removal/replacement is planned at this time.

G. H. LANTZ

GHL/jb(2-45)

cc: