INTRACOMPANY CORRESPONDENCE
R-98 (Rev. 1-68)

PLAINTIFF'S EXHIBIT
RMC-365

FROM: Ronald E. Benton - Ind. Hyg. & Tox., E-L-12

TO: ROGER F. NELSON - SHERWIN ALUMINA PLANT

COPY: Hector De La Garza, Dave Ogle, Sherwin;
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Dr. E. C. Irby, E-L-9

DATE & SUBJECT: July 1, 1991 AUDIT, NORTHWEST ENVIROCON

At your request, an audit of NORTHWEST ENVIROCON'S performance at Sherwin was conducted on June 4-6, 1991. The goal of the audit was to ensure that the asbestos control program at Sherwin is complying with all applicable federal, state, and local regulations in the most cost-effective manner. Overall, it appears that the asbestos removal work being performed at Sherwin is both necessary and required, although not always carried out in the most cost-effective manner.

DISCUSSION

As a result of the Reynolds COM, C-19.62.30, all facilities involved in asbestos demolition/removal work must have a competent person on site to oversee this work. This competent person can either be a trained company employee or a consultant. This competent person requirement is also mandated in the new EPA NESHAPS regulation. Due to current manpower limitations, the Sherwin Plant has opted for an outside consultant by utilizing the services of Northwest Envirocon (NWE).

A review of NWE'S work revealed several practices that could be accomplished in a more cost-effective manner. Following are my comments on those practices:

1) Multiple copies are being made of all documents generated during a project. Only two copies are necessary.

2) Copying of documents is currently being done by the project administrator and/or the air technician. This is not the best utilization of their time. Where necessary, a clerical person will be used for this job.

3) Daily handwritten project logs are being typed by the Houston office of NWE. This will be discontinued.

4) Multiple copies of documents are being maintained in several different binders. Where appropriate, single copies will be kept in a single master binder.

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5) NWE currently keeps written records of all communications with plant personnel. While this is necessary to ensure proper documentation, the appointment of a single plant person to act as a liaison between other plant personnel and NWE would reduce the amount of records being generated and maintained.

A review was also made of the actual removal work being carried out, in order to determine if it was being performed in the most cost-effective manner. The results of that audit indicated two possible areas where changes could be incorporated. Following are my comments on those items:

1. Some of the small-scale, short-duration work is being done on an overtime basis for the removal contractor and NWE. While this is unavoidable in some cases, where feasible, better communication of downtime and removal needs should be made to NWE. Again, a single plant contact should facilitate this issue.

2. Most, if not all, the small-scale, short-duration jobs are being performed by constructing an enclosure around the work. The construction of an enclosure is the most expensive phase on this type job and may account for 30-40% of the final costs. The current NESHAPS regulation only requires that there be no visible emissions during the removal. Consequently, the plant should contact the Texas Air Control Board concerning the feasibility of alternative removal options, such as wet methods, that may be acceptable.

SUMMARY

The use of a competent person to oversee removal projects is both necessary and required. Although not all of the records currently being generated and maintained are legally mandated, they should be considered necessary documentation that the work is being carried out in a manner consistent with company policy and state and federal regulations.

Several recommendations have been made which should help to control, if not reduce, the current costs of asbestos abatement jobs at the Sherwin Plant.

In order for the plant to determine whether or not NWE is the most cost-efficient contractor for this type work, additional bids should be solicited from other contractors. By comparing the bids for similar services, the plant should be able to decide whether other more cost-effective consultants are available.

If you have any questions concerning this report, please contact me at Extension 3795.

Ronald E. Benton

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