

FROM L. E. TATE

TO J. L. DIEDERICH
METALS & CHEMICALS GROUP
PITTSBURGH - 25

1989 FEBRUARY 01

RE: ASBESTOS

Attached is a letter from our Safety and Health Group, here at Massena, relative to asbestos compliance.

In the Smelting Plant, we have some materials containing asbestos:

- Transite Pipe connecting wall to pot. As they break, or are damaged, we do replace with fiberglass and make the change according to approved procedures.
- Flamastic cable covering for electrical cables; without disruption - there is no problem.
- Siding and roofing on some buildings. Without disruption, or dismantling - there is no problem. Removal of the siding will require us to obtain a special variance from the state.
- Asbestos insulation on pot legs - no problems as is, unless damaged or being handled in an abnormal fashion.

We are very sensitive to handling these items during dismantling or handling damaged items. There are no major issues that require immediate attention to correct a high hazard situation.

Darry
L. E. TATE

LET:mba
Attachment

C:	R. C. Rawe	-	Pittsburgh
	R. J. Hosfeld	-	Pittsburgh
	T. S. Mock	-	01
	S. M. Anderson	-	25
	J. P. Carroll	-	12
	J. D. Whitton	-	301
	V. C. Adorno	-	402
	D. R. Wilson	-	8



SF-4563 (REV 85-7)

ALCOA0000010474



FROM: S. M. ANDERSON

TO: T. S. MOCK

1989 January 16

RE: MASSENA'S ASBESTOS COMPLIANCE

Massena's asbestos handling and removal is regulated by OSHA and the New York State Department of Labor. The New York regulations are much stricter than OSHA's. The New York regulations require the licensing of companies that remove asbestos, employ only certified workers, utilize an impartial third party to conduct air sampling and to remove asbestos in accordance with New York State regulations.

The following are steps taken by Massena to comply with OSHA and New York regulations:

- o Massena Operations is a licensed asbestos removal contractor. *good!*
- o Twenty-five employees - hourly, staff, and supervisory - have completed at least three days of asbestos abatement training conducted by the University of Kansas. All of these individuals are certified asbestos workers.
- o All large project air sampling is conducted by Galson Technical Services of Syracuse.
- o Bill Boyea and Scott Anderson are licensed by the EPA as Asbestos Abatement Supervisors.
- o We are planning to train and certify additional maintenance personnel to remove small amounts of asbestos. This training is scheduled for the first quarter 1989.
- o On January 25, Joe Sabattis, of Galson Technical Services will be in Massena to discuss options to repair or remove asbestos on the CA furnaces in Building 131 and removal and disposal of asbestos containing roofing material.
- o All asbestos removal and equipment is controlled by Environmental and Building Maintenance Department. Only certified workers are assigned to jobs involving asbestos.
- o All asbestos workers are non-smokers and receive annual physicals. *non-smokers risk of asbestos related lung cancer are much lower than smokers.*



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- o We have requested and received variances from the New York State regulations. These variances have allowed us to remove asbestos in the most cost effective manner. However, these variances require six months to receive.

Compliance with the OSHA regulation is easy when compared with the New York regulations. We have received three minor citations for violations of the New York regulations and those were abated immediately. The New York regulations are written to protect the public health, and many of the work practices cannot be performed in an industrial setting without halting all production. We have been commenting directly to the Department of Labor and indirectly through the Business Council on proposed regulatory changes that will allow us to remove asbestos in a safe cost effective manner.

SCOTT M. ANDERSON

SMA:af1-17

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