PLAINTIFF'S EXHIBIT
tabbies
AL-663

T. B. BONNEY

MEMORANDUM

PITTSBURGH OFFICE - 7

March 14, 1975

cc: G. H. Farrah - Alcoa Technical Center

RE: POINT COMFORT CTPV CITATION

For possible use with regard to Point Comfort's OSHA citation for violation of the CTPV Standard, we need convincing analytical data about respirator performance on Soderberg effluents. Additional testing similar to that set up by Point Comfort in which they compared the performance of Dustfoe, Gasfoe, and glass fiber filter plus charcoal are desirable. Analytical data that is already on hand implies that such tests will be most useful in justifying our employees' use of a filter rather than chemical cartridge respirator.

COPY

On the other hand, the analytical problems encountered with these samples make the present test data of limited value. If reasonable recoveries (by GC) of total hydrocarbons can be obtained, a repeat analyses of the samples already submitted will be worthwhile. Additional sampling will also be required (3 additional tests should be adequate) to convince ourselves that the data are representative. In subsequent testing, we should make certain that the type of charcoal and the packing (for the charcoal tubes) are of a quality suitable for the purpose. Also, it is essential that by-passing of the respirator material is not possible.

GC reruns should also be made on the samples resulting from the filter evaluation system devised by EHL. It is my understanding that attempts will also be made to obtain both gravimetric and GC analyses of the 3M #8706, 3M #8710, and MSA #77 filter material.

It will be extremely useful for the citation contest if we can identify and quantitate from Point Comfort potroom contaminants (captured on glass fiber filters), specific materials, soluble in benzene that have established threshold limit values. Naphthalene is the only compound likely to be present that immediately comes to mind. If we can find significant amounts of such materials, these can be subtracted from the benzene solubles.

Following an evaluation of the data resulting from the above, we can then determine if any supplementary data is required.

T. B. BONNEY MEMORANDUM

PITTSBURGH OFFICE - 7

March 6, 1975

cc: Dr. M. O. Colwell - Pittsburgh Office - 29
Dr. B. D. Dinman - Pittsburgh Office - 7
Mr. R. H. Watson - Pittsburgh Office - 7

RE: UNITED STEELWORKERS OF AMERICA

A meeting with Mr. Marco Vestich has been scheduled for Thursday, March 13 at 9:00 A.M. in Room 253. If they are available, Marco will bring along Adolf Schwartz and the Steelworkers' new industrial hygienist.

Marco has indicated that he is mainly interested in discussing generalities - which coincides at least in part with our desire to discuss how our mutual goals might best be achieved. However, he did mention a desire to talk about some individual plants and perhaps a word or two about our legal battle with OSHA vs MESA. We had quite a telephone discussion about coke oven emissions. Since the Steelworkers are deeply involved in the Coke Oven Standard hearings, I suspect we will get into some detailed discussions about particulate polycyclic organic matter.

We will also want to discuss the contest of Pt. Comfort's OSHA citation for violation of the Coal Tar Pitch Volatiles Standard. In this regard, we should also discuss the apparent intent of Pt. Comfort's union to use OSHA as a means of attaining some of its safety and health goals. In this regard, we will want to stress our overall desire to work out safety and health problems without benefit of OSHA and preferably within our joint safety and health committees.

If anyone has any other items of special interest which they feel should be put on the agenda, please let me know.

T. B. BONNEY

TBB:gk

COPY

ALCOA

T. B. BONNEY

PITTSBURGH OFFICE - 7

MR. E. D. MARKS

PITTSBURGH OFFICE - 13

March 3, 1975

cc: G. H. Farrah - Alcoa Technical Center
N. Jarrett - Alcoa Technical Center
R. D. Wiltzius - Pittsburgh Office - 23
fc routed: B. D. Dinman - Pittsburgh Office - 7

RE: OSHA CITATION ON COAL TAR PITCH VOLATILES -
POINT COMFORT WORKS

You previously mentioned that in preparation for our contest of the captioned, you would eventually need some details about Soderberg operations and potroom environmental monitoring. This would enable you to better handle the issues of feasibility (or infeasibility) of administrative and engineering control and the ambiguities of the sampling and analytical methods for "coal tar pitch volatiles."

COPY

For a starter, I would suggest you talk to Ray Wiltzius. He was chairman of a task force that looked into possible means of controlling employee exposures to Soderberg emissions. He is quite familiar with the potroom operations and the overall activity of the task force. Noel Jarrett at the Alcoa Technical Center was also a member of this group, and his people looked at possible approaches to engineering control. He would be a good resource for you also.

George Farrah, also at Alcoa Technical Center, is the Chief of our Environmental Health Laboratories. From its inception, George has been involved with the Aluminum Association's analytical task force on coal tar pitch volatiles. He will be able to provide you with as much detail as you want on the sampling and analytical aspects.

If I can be of any help to you before, after, or during your conversations with these people, please let me know.

THOMAS B. BONNEY

TBB:gk

ALCOA