FROM R. E. PODHORA
INDUSTRIAL HYGIENE DEPARTMENT
POINT COMFORT OPERATIONS

TO MR. THOMAS B. BONNEY AUG 7 1978
PITTSBURGH OFFICE

cc: Mr. R. M. Rose
Mr. F. J. Mabry
Mr. G. Gehlhoff/Mr. G. L. Williams
Mr. D. J. Fisher/Ms. K. M. Johnson
Mr. Leslie Pfeil
Mr. Chase Phillips/Mr. L. Stringham
Ms. Edna Wagner

1978 August 04

RE: ELIMINATION OF UNNECESSARY USE OF ASBESTOS CONTAINING MATERIALS

This is to acknowledge today's receipt of your captioned letter dated 1978 July 28. We at Point Comfort have been working toward the goal of eliminating the use of asbestos containing materials since December, 1974. There are still a few uses in the plant where good substitutes are difficult to find and your assistance will be greatly appreciated.

One such area is the use of Marinite for molds at Ingot Casting. Some plants such as Wenatchee and likely others are having their Marinite cut outside their plants. Has a satisfactory substitute for Marinite been accepted?

We are currently working with our Purchasing Department and Fiberfrax to obtain suitable substitutes for 1/32" and 1/8" asbestos sheet for furnace flow cone wrapping, trough covers, etc.

We are also developing a training program for maintenance personnel and others who are involved with jobs such as old insulation removal. Attached are copies of two letters describing our recent efforts.

Our Insulating Department has developed some good practices which should be helpful to others in similar jobs at other plants. If procedures such as ours have not been developed at other refining plants or where large volumes of insulation are used, perhaps the attached material may be of some benefit.

We will comply with your request to survey the plant and plan to submit the results by 1978 September 01.

Rudy E. Podhora
R. E. PODHORA

REP:vh

Attachments

(copy of Mr. Bonney's letter to all carbon copy recipients.)



APC 003706

ALCOA

SF-4563

FROM: R. M. ROSE/RUDY PODHORA

POINT COMFORT OPERATIONS

TO: MANAGERS, SUPERINTENDENTS, and DEPARTMENT HEADS
POINT COMFORT OPERATIONS

cc: Mr. Bobby Sowders & On-site Construction Superintendents

1978 July 10

RE: INSULATION REMOVAL AND DISPOSAL

It was brought to our attention 1978 June 28, by members of the insulating department and Bobby Sowders that craftsmen such as pipefitters, mechanical maintenance personnel and others were observed removing insulation from pipes or vessels without the knowledge of the possibility of asbestos in the insulation. The removal of insulation, in most instances, is being done without the proper protective equipment and the craftsmen are using improper disposal procedures for the debris that is generated from this process. Our insulators have been trained to properly handle asbestos materials and, therefore, work under the policy that all insulation contains asbestos until determined otherwise.

In order to maintain compliance with Federal Regulation No. 1910.1001 (asbestos) and to avoid asbestos exposures, the procedures used by the Insulation Department are to be utilized by others who need to remove insulation for one reason or another. These procedures are generalized below:

1. To avoid unexpected and unnecessary asbestos exposure, assume that all insulation contains asbestos.

2. Before demolition or insulation removal is started, all personnel are to be properly protected with NIOSH approved respirators and proper protective clothing, such as disposable coveralls and gloves, head and foot covering.

3. A small sample of the insulation is to be submitted to the Industrial Hygiene Department for microscopic analysis for asbestos. You will be advised whether the insulation contains asbestos or not.

4. If the insulation contains asbestos and whenever conditions and circumstances permit, the insulation should be soaked with water to eliminate or minimize dust generation during demolition.

5. Debris from demolition is to be cleaned up as follows:

   a. Using the above respiratory protection and protective clothing, all asbestos debris is to be promptly cleaned up and put in plastic bags, sealed, and then deposited in the special asbestos disposal Dempster bucket. It is essential that asbestos debris be promptly cleaned up to minimize the amount of dust that can become airborne by the wind.

   b. The asbestos is then buried in the solid waste disposal area.

6. Good housekeeping procedures are to be followed

Rudy E. Podhora

R. M. ROSE/R. E. PODHORA
RMR/REP/mg

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