THOMAS B. BONNEY

PITTSBURGH OFFICE - 7

DR. M. O. COLWELL

PITTSBURGH OFFICE - 29

December 9, 1974

RE: POINT COMFORT - VIOLATIONS OF ASBESTOS STANDARD

The citations Point Comfort received for alleged violations of the asbestos standard involved the mixing of asbestos and molasses. The mixture is used to pack the space between the collector bar and the hole provided for it in the pot shell.

The operation was a surprise to all except those in the department where the work was being done. Most of the concerned people at Point Comfort were of the opinion that their use of asbestos was well controlled if not eliminated. The use of asbestos for this operation has been discontinued since November 22, 1974.

The OSHA industrial hygienist did not cite us for exposing our employee to concentrations of asbestos in excess of those permissible. Undoubtedly, this was because he took no air samples but relied only on visual observation. Some of the sections of the standard for which they were cited presumed that excessive concentrations existed or could have existed. Technically, we would be on pretty solid ground in contesting these, since the presence of excessive airborne concentrations were not firmly established. However, other violations for which we were cited required only that asbestos be involved in the operation. Therefore, contesting the citations could, at best, result in reducing their number rather than eliminating them entirely. Furthermore, the operation as described to me was one we would not be too proud of.

Point Comfort does not intend to contest the citations and I concur with this. We would have little to gain and much to lose by contesting. For much time and expense, we might reduce the imposed $600 fine at the expense of aggravating the OSHA personnel who still have not finished with Point Comfort.

THOMAS B. BONNEY

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cc: Dr. B. D. Dinman - Pittsburgh Office - 7

