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**ENVIRONMENTAL
ELEMENTS
CORPORATION**
Subsidiary of Koppers Company, Inc.

June 18, 1976

Aluminum Company of America
1501 Alcoa Building
Pittsburgh, PA 15219

Attention: Mr. R. C. Cook

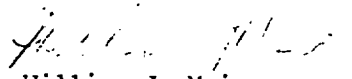
Subject: Electrostatic Precipitator
Your Order No. EN232033BR
Environmental Elements S.O. 370775

Gentlemen:

Enclosed is a memo from our Mr. A. R. Trimble which discusses the OSHA regulations for handling asbestos rope gasketing. This memo confirms an earlier conversation with Mr. Trimble of some months ago.

If there are any questions, please do not hesitate to call me.

Very truly yours,


William J. Meier
Contract Administrator
Air Cleaning Systems

WJM:ccg

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ENVIRONMENTAL ELEMENTS CORPORATION

Subsidiary of Koppers Company, Inc.

Interoffice Correspondence

To W. J. Meier

From A. R. Trimble

Location ACS Contract Administration

Location ACS Design Engineering

Subject Asbestos Rope Handling
Ref: Alcoa, 370775

Date June 11, 1976

We reply to Alcoa's request for assurance that the handling of asbestos rope gasketing at the construction site will not be in violation of OSHA regulations. Asbestos gasketing is utilized during the erection of precipitators in two forms. First as a hard rope gasket, pre-cut and shop installed for access door seals. Since there is no field cutting for this application there will be no violations. Second as coiled, soft asbestos rope for flange type gaskets in ductwork and similar applications. It is this second use that is in question.

We have contacted the Acting Area Director for OSHA of the U.S. Bureau of Labor, Mrs. L. R. Anku, and requested an opinion. We described the material and its use, specifically that the necessary quantity would be uncoiled, cut with a knife or hatchet, dipped in red lead, then applied to the joint flange. Further, that this operation was normally carried out in the open and not in enclosed areas.

Mrs. Anku stated that OSHA regulations were quite specific as to the size and quantity of asbestos fibers permissible at a work site. Also the only way to be positive there is no violation is to conduct air quality tests at the site. She stated that the Federal Government did not maintain a consulting service but she did not believe there would be any violation in the operation described. She suggested we contact the Maryland Division of Labor and Industry, Occupational Safety & Health, Consulting Services Section for an opinion. The State of Maryland's Occupational Safety and Health Standards for general industry are identical to the Federal standards.

We have contacted the above Maryland office and it is their opinion that the described operation would not be in violation.

We have had no problems at our erection sites to date regarding cutting and handling asbestos gasketing materials and would not anticipate any at the Alcoa site.

A. Ronald Trimble
A. Ronald Trimble

ART/cmk
cc: A. R. Trimble