

FROM: E. RUMBERGER
PITTSBURGH OFFICE

TO MR. GARY C. GRIESBACH
ROCKDALE WORKS

MR. E. B. PARKER
ROCKDALE WORKS

1983 June 29

RE: ROCKDALE WORKS
Ref: Recent OSHA Industrial Hygiene Inspection
and Resulting Citations

Please refer to your 1983 June 22 letter to Mr. J. R. Archibald and myself. I have consulted with George Heise in formulating our responding comments.

Violations #1 & #2 -- These appear to be straightforward, and you have logical answers to protect employees during the removal of caustic materials from the smelting pots by providing an adequate faceshield with hood, as well as providing an eye wash station at the at the site.

Violation #3 -- Involved Rockdale's use of the improper and unapproved respirator, Blue Mask 3M-8706. This mask was originally designed for use in the aluminum industry as a dust mask but, also, contained activated alumina for relief from HF fumes. It was never given NIOSH approval as it fell short in particulate filtering efficiency. What you are asking for in an approved version thereof was, in fact, accomplished three years ago with the development of Blue Mask 3M-9906, which is approved for dust and fumes and, also, contains the activated alumina to filter HF gas. An I.H. Technical Bulletin No. 80-2, dated 1980 July 11, was issued to the plants encouraging the changeover to this approved dust mask. Based on 1982 prices, this approved mask costs \$.21 more than the unapproved mask (\$1.26 for the #9906 vs. \$1.05 for the #8706). Most of the other smelters did make this change for potroom use. The 3M-9920 which you mention is an approved respirator, but costs \$2.44 each for the heavy-duty mask -- and it does not contain activated alumina, and would not provide any relief from HF gas. The airstream helmet you mentioned is approved, but would be providing far greater protection than is required -- at considerably higher costs. We, again, encourage the use of 3M-9906 as the logical and most practical solution; and we, again, encourage its use in the bath crusher area, as well as for all potroom use.

ARD 014263



Messrs. G. C. Griesbach &
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Violation #4 -- This violation refers to the lack of housekeeping and dusty conditions at the ore bucket filling station on Line 8, Room 134. As you have indicated, there have been plans (prior to the OSHA inspection) to make improvements at this ore filling station and, as a result, you have a logical answer for abatement. We understand you will need to request an extension date for abatement. It is unfortunate that with this corrective plan in hand that we were not able to convince the inspector not to issue a citation.

You raise the question about the advisability of contesting this citation considering the ramifications it might have regarding other Rockdale potlines, as well as potlines at other Alcoa facilities. This is a logical question, but we fail to see on what grounds you would intend to contest. You are correct in that there is always some potential for their returning and issuing a repeat citation for the dusting problems in Lines 1-6 Loading Stations. If that occasion were to appear likely in a future inspection, I think we should resist very strongly on the issuance of any future citation based upon the R/A submission you have in process (Request #RS1497). Should we fail in this endeavor and citations would be issued, it would be a question of negotiating the extended abatement dates which would be necessary for such a major project as covered in this \$1.9 million R/A. As to the implications to other Alcoa facilities, we think it is highly remote and most unlikely that any other location would receive a repeat citation based upon the Rockdale citation on Line 8.

Frankly, it would appear best to us to accept the existing citation (with a negotiated extension) and make our corrections with as little fuss as possible. Then, if we should face this problem on other ore filling stations, we should negotiate with any OSHA inspector and try to discourage any citations based upon an active plan for improvements already in process, along with the necessary time to test the design being installed on Line 8. We will be very interested in your decision.

E. E. RUMBERGER

EER/eds

cc: W. J. Drake - Rockdale
G. H. Lantz - Rockdale
J. W. Havins - Rockdale
H. N. Mueller - Rockdale
D. R. Scott - Rockdale

J. R. Archibald/G. C. Heise - Pgh.
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