



From L.L. RIPPEY
R.A. KAUFMAN
PITTSBURGH OFFICE - 6

To W.S. STROUD
ALCOA TENNESSEE

1987 August 14

RE: TENNESSEE TRIP REPORT - JULY 17,18

During our recent FDA trip to Tennessee, we also got a chance to meet briefly with your staff and to tour the plant. We appreciate the time you and your staff spent with us and would like to offer some comments and recommendations relative to our discussions.

HAZARD COMMUNICATION

We were encouraged to hear that your in-house hazard communication labels are in the storeroom and that you have immediate plans to come into full compliance with this aspect of the regulation. During discussions with Allen Baxter, it was mentioned that Tennessee was forming a Hazard Communication Steering Committee which would be comprised of both hourly and salaried members. We would appreciate hearing about how this committee functions and if their involvement facilitates management of the Hazard Communication program. It sounds like a good idea.

In adapting Haz. Com. labels to in-house needs, several plants have come up with some ideas which may also be appropriate for Tennessee. Lebanon has found a source of Haz. Com. placards for outdoor applications and for area posting. These signs are 18" x 18" aluminum signs with reflective enamel paint conforming to Alcoa's Engineering Standard for outdoor signs. The cost should be in the neighborhood of \$20. These may be ordered from:

Hall Sign Co.
3000 W. 3rd St.
P.O. Box 515
Bloomington, IN 47402

There are several plants who are using laminating kits to create reusable tags for portable containers and to make more durable labels for indoor use. (See L. L. Rippey's memo of 1987 January 21 on this subject which is attached.)

Some time ago, Haig Sakoian asked us about sources of Haz. Com, training booklets. At that time we had not seen anything, but since then, we have found that there is a new series of booklets available from Krames Communications. (Their flyer is attached for your convenience.)



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PLAINTIFF'S
EXHIBIT

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Thank you for the opportunity to view Tennessee's new Emergency Response video. It's a very impressive, professional quality program. We assumed that it was intended for viewing by the general plant population because of the nature of the message. Our only concern is that Alcoa employees understand that the immediate action which you are asking them to take in response to spills is within their own work area and within the scope of their job. If this is not the case, these emergency response activities may fall within the scope of OSHA's Hazardous Waste and Emergency Response regulations. We're certain that you are aware of this aspect of these new OSHA regulation but hope that the employees viewing this video also understand.

ASBESTOS

With the new OSHA rules on asbestos, please be aware that it is now necessary to "label" installed asbestos containing materials. This can either be done through direct labeling or some alternative method of informing employees who have a need for this information where the asbestos containing materials are located. Your plan to begin using PLM (Polarized Light Microscopy) at the plant level for the determination of asbestos in bulk samples should enable you to do this job easily and quickly and accurately. This ability to analyze samples quickly is, as we're sure you have experienced, an invaluable tool.

As you probably noted in L. L. Rippey's 1987 June 26 letter on asbestos, we shared your idea of creating an environmental permit for demolition/renovation projects to cover the possibility of the presence of asbestos. Some of the feedback which we received on your idea was to also consider adding asbestos to the environmental control checklist which is completed during the R/A process. This would only cover the big jobs but it might be worthwhile. We would be interested in your ideas concerning this suggestion before we pursue it.

NOISE

Tennessee may want to consider a hearing conservation policy change similar to the one which Massena is making. Massena has reviewed their hearing conservation program, and decided that they will better be able to prevent hearing loss and cover non-production employees by making the requirement for hearing protection at 85 dBA TWA a plant policy. This will eliminate the requirement for dual signs where the 85 dBA areas were posted with "Hearing Protection Recommended" signs. This change will also eliminate the dual standard in enforcing hearing protection

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at 85 dBA for employees with permanent threshold shifts. A number of Alcoa locations, Warrick, Rockdale, Lebanon, Wenatchee, Richmond, Addy and Massena either have lowered or are in the process of lowering the level of mandatory hearing protection from 90 to 85. Chris Dixon-Ernst expects that this will provide a vehicle to improve the effectiveness of these programs. Some of those plants who have mandatory hearing protection when time weighted exposure exceeds 85 dBA are the most effective in the system. Although this or any rule change is not easy, it can be done effectively by:

- Involving production supervisors and/or the Joint Safety and Health Committee in the decision and implementation
- Educating employees and supervision about the reasons for the rule change

We enjoyed our visit to Tennessee. Thank you for your hospitality during that time; and if you have any questions or comments concerning this memo, please do not hesitate to call.

L. L. RIPPEY
R. A. KAUFMAN

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Att,
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