

MEMORANDUM

February 7, 1990

TO: N. T. CHAPLIN - G-4-11

FROM: RONALD E. BENTON - IND. HYG. & TOX - E-L-12

CC: J. R. AMOS - G-4-9
T. M. MCCracken - E-L-2

SUBJECT: TRIP REPORT - SHERWIN ALUMINA

At your request, I visited the Sherwin Plant to audit the plant's asbestos removal program. During my visit, I spoke with Hector DeLaGarza, Ken Skreckengost, Walter Lew, Bill Hamblin, Frank Strickland, and Roger Nelson. In addition, I visited several asbestos removal projects being carried out by Industrial Specialists, Inc. and Gilman Insulation.

Although some changes are needed in the program, the plant should be commended for its concern and efforts to insure that the asbestos removal is being carried out in a safe and cost-effective manner. Based upon observations during my visit, I would make the following comments:

- (1) It does not appear that the plant has been firm enough with the contractor when violations were observed. All contractors should be made aware that RMC will not tolerate removal work being done which is in violation of federal, state or local regulations or RMC specifications.
- (2) The proposed Corporate Operating Manual, dealing with the selection and audit of asbestos removal contractors, states that the individual(s) responsible for monitoring asbestos removal jobs successfully complete an EPA-approved asbestos supervisor course. Currently, only Hector DeLaGarza has successfully completed such a course.
- (3) There is a lack of adequate written documentation on the part of Reynolds Metals Company, the contractors, and the air monitoring firms. It is essential that the documentation be accurate and complete during all phases of the removal projects.

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- (4) The amount of time spent auditing the performance of the abatement contractors work is inadequate. At the present time, Mr. Skreckengost and Mr. DeLaGarza visits each jobsite once or, at most, twice per day. The visits generally last no more than twenty minutes. As a result, the "auditing" of the contractor's performance is less than 10% of the work shift.
- (5) The work by Gilman Insulation Company is less than satisfactory. Comments by Ken Skreckengost and Hector DeLaGarza, as well as personal observations, indicate that Gilman does not always follow the appropriate regulations when performing asbestos removal work.
- (6) The personnel presently conducting air monitoring are being hired by the removal contractors and, thereby, may be creating a potential conflict of interest.

As a result of the above noted items, I would make the following recommendations:

The plant should identify at least one individual who would be responsible for overseeing all of the removal projects. This individual must have successfully completed an EPA-approved asbestos training course for supervisors and can be either an RMC employee or an outside third party. This person would also be responsible for ensuring that the plant complies with the Corporate guidelines dealing with the selection and audit of contractors performing asbestos abatement work at Reynolds. In addition, he would be responsible for ensuring that adequate documentation is being kept during all phases of the removal project. This individual must also be given the authority to ensure that the contractor not only meets the applicable federal, state, and local regulations, but complies with any company specifications dealing with the project. In certain instances, it may be necessary for the monitor to actually stop a project until the violation has been corrected.

If a separate air monitoring firm is hired, it should be hired directly by RMC. The firm will then be responsible to Reynolds and not the removal contractor. By hiring the firm directly, RMC should also be able to save the additional 10-15% tacked on by the removal contractor. (If a third party is utilized to "monitor" the removal project, in most cases, this same firm can also provide the required air monitoring.)

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Since it is our policy to not hire any asbestos abatement contractor who does not comply with federal, state, or local regulations, or RMC specifications, regarding asbestos removal, adequate feedback concerning this issue must be provided to Richmond. With this information, such contractors can be removed from the RMC approved list of asbestos abatement contractors.

In summary, the Sherwin Plant is doing the best job that it can to insure that the removal projects are being done in the safest and most cost-effective manner. Due to the present operating conditions, however, it is not possible for the plant to provide the necessary manpower to do the job as thoroughly as is necessary. It was obvious during my visit that the plant is committed to doing the job correctly, and I hope that my comments will be of help.

If you have any questions, please contact me.

Ronald E. Benton

Ronald E. Benton

REB/cjs

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