MILES O. COLWELL, M.D.
PITTSBURGH OFFICE

MR. A. M. HUNT
PITTSBURGH OFFICE - 30

September 8, 1971

Re: OCCUPATIONAL HEALTH AND SAFETY ACT OF 1970

Thank you very much for sending the material to me you received at the meeting of the Board of Directors of Allendale Mutual Insurance Company concerning the above noted Act. The summaries are good and I have placed them in my file for future use.

You might be interested in Alcoa's preparation to date to meet the requirements of the Act. We brought all plant managers to Pittsburgh on April 1, 1971 for a seminar concerning the meaning of the Act and their responsibilities under same. Since then we held similar seminars in Pittsburgh for the Allied Products group and one at ARL for their key personnel. We have assisted the plants in reorganizing their staff responsibilities re environmental activities where necessary. We have had the Pittsburgh Organization and Compensation people visit with our staff and also visit two plants to assist us in present reorganization and in the development of future staffing requirements.

In spite of all of the above preparation, I'm certain we will have some difficult days ahead as the Federal Occupational Safety and Health Act of 1970 is implemented. However, I am confident we can respond in a professional manner to any problems presented to our staff.

MILES O. COLWELL, M.D.

MOC:db

P.S: After I finished this note to you, I read the attached cover letter from T.B.Bonney to our plants--I thought you might be interested in the type support we provide our plant personnel.

M.O.C.

Att.

PLAINTIFF'S
EXHIBIT
AL-1408

ALCOA

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FROM THOMAS B. BONNEY TO INDUSTRIAL HYGIENISTS

PITTSBURGH OFFICE

September 3, 1971

RE: OCCUPATIONAL SAFETY AND HEALTH STANDARDS

Of the Occupational Safety and Health Standards published in the Federal Register on May 29, those of primary interest to the industrial hygienist are contained in Subparts G, H, I and Q. All of you must become intimately acquainted with the provisions in these subparts that apply directly to operations at your location.

In looking over these subparts, we noted several items that could stand some clarification. Other important ones were clear enough, but their brevity might cause them to be overlooked. The following comments concern these types of entries. They are offered in hope that they may be of assistance to you.

SUBPART G - OCCUPATIONAL HEALTH AND ENVIRONMENTAL CONTROL

Sec. 1910.93 Air Contaminants. This section states that exposures above the concentrations listed in the ACGIH list of Threshold Limit Values for 1970 shall be avoided. We interpret the listed concentrations, except those designated with a "C" (Ceiling Value) to mean time-weighted averages for any 8-hour workday of a 40-hour workweek. This interpretation is clearly stated by the governmental hygienists from whom the OSHA Standards were taken, in the Preface of the Threshold Limit Values which was omitted in Part 1910. Even Table G-2, which includes values taken from ANSI Standards, indicates that time-weighted averages are intended. Amendments to the first group of standards subsequently published by the Department of Labor in the August 13 Federal Register eliminate the ambiguity and conform with the above interpretation.

It is important that when an air sample collected in a working area shows a value above the TLV, a sufficient number of additional samples must be taken so that it can be determined if the time-weighted average is above or below the TLV. Care must be taken with record keeping. Unless otherwise indicated, a single number recorded will be interpreted as the time-weighted average.

When excessive values are recorded, one must note if employees are actually exposed to these concentrations. If so, note if they are wearing personal protective devices. If personal protection is worn, an excessively high contamination level may not constitute a violation.

We would further point out the wearing of personal protective devices does not automatically put one in compliance with Section 1910.93. Paragraph 1910.93(b) states that "feasible administrative or engineering controls must first be determined and implemented in all cases." It is obvious that the Department of

Labor intends that contaminants be controlled at the sources. The test of feasibility of other control methods will determine whether or not personal protective equipment may be used to achieve compliance.

Section 1910.94 Ventilation. Paragraph 1910.94(b)(2) is of special interest in view of the large number of grinding, polishing or buffing units throughout the Company. The paragraph states that "Every establishment performing dry grinding, dry polishing, or buffing shall provide suitable hood or enclosures that are connected to exhaust systems."

Paragraph 1910.94(d)(8)(ii) refers to ventilation of open surface tanks. It states that "Recirculation (of exhaust air) shall only be through a device for contaminant removal which will prevent the creation of a health hazard in the room or area to which the air is recirculated." We interpret the necessary degree of air cleaning to be that which reduces the concentration of the contaminant to a level below its Threshold Limit Value. This interpretation applies not only to recirculated air from open surface tank exhausts, but other exhausts as well.

One must always be careful about recirculating exhaust air because state and local authorities may have stricter regulations than those promulgated by the Federal Government. Pennsylvania, for instance, will allow no recirculation without the approval of their Industrial Hygiene Division, and they don't approve many.

Section 1910.95 Occupational Noise Exposure. The enclosed booklet, "Guidelines to the Department of Labors Occupational Noise Standards," was prepared by the Department of Labor to explain the provisions of the Walsh-Healey Occupational Noise Standard, and to show what is expected of the employer in order that he be in compliance. Because the Walsh-Healey noise standard was included, in toto, in the regulations under the Occupational Safety and Health Act, the contents of the booklet are applicable to all industrial establishments, not only those having government contracts. The booklet offers excellent guidance in carrying out a hearing conservation program.

SUPBART I - PERSONAL PROTECTIVE EQUIPMENT

Sec. 1910.134 - Respiratory Protection. The requirements for users of respiratory equipment are quite detailed and specific. Those having responsibilities for respirator protection programs should read this section carefully. Generally, both the Safety Director and the Industrial Hygienist are involved. Among other

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things, the OSHA regulations require maintenance and care of respirators including inspection for defects, cleaning and disinfecting, repair, and storage.

SUBPART Q - WELDING, CUTTING AND BRAZING

Sec. 1910.252 Welding, Cutting and Brazing. Included in this section are the usual ventilation requirements. One unusual requirement is the labeling of all hazardous materials used in these processes (1910.252(f)(1)(v)). Even filler metals must be tagged with a precautionary statement beginning with "Welding may produce fumes and gases hazardous to health." The responsibility for appropriate labeling should be passed back to your suppliers.

General. As you can realize, the next several months working with OSHA will be a period of learning together. However, if you have any questions about the Act or the Standards under it, please let us know. We'll try to come up with an answer.

Tom Bonney

Thomas B. Bonney

TBB:mh

Attachment

cc: G. H. Farrah, ATC
J. M. Plunkett, ATC
V. W. Rieke, Pittsburgh
R. H. Watson, Pittsburgh
L. V. Cralley, Pittsburgh