FILE NAME: Reynolds Metals (RM)

DATE: 1974 Jan 24

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INTRACOMPANY CORRESPONDENCE
R-98 (Rev. 1-68)

PLAINTIFF'S EXHIBIT

FROM:	H. M. Cole - Richmond GOB
TO:	G. L. Suffredini - Sherwin
COPY:	C. Craig, H. R. Bratt, M. D. - Sherwin; B. J. Sasser - GOB; H. Featherson, Drs. MacMillan and Irby, J. S. Kinzey, R. B. Newman - 1
DATE & SUBJECT:	January 24, 1974 PRELIMINARY INDUSTRIAL HYGIENE SURVEY - SHERWIN

COMPANY CONFIDENTIAL

At the request of Mr. Henry Featherston, a preliminary industrial hygiene survey was made on the Sherwin Alumina Plant January 15 - 18, 1974. No measurements were taken but the following items were noted during the course of that survey. An in-depth study will be made at a subsequent date to determine complaince or non-compliance with present OSHA regulations.

Item 1 - Asbestos

A. Personal protective equipment - General industry standard CFR 1910.93A(c)(iii) requires respiratory protection and protective clothing for any employee engaged in operations involving spraying, demolition, or removal of asbestos insulation or coverings. Serious violation. Applicable to most all areas of the plant.

B. Standard CFR 1910.93A(f): A monitoring program was not provided to determine exposure of employees engaged in applying or demolition of asbestos insulation.

C. Caution signs were not provided at locations where airborne asbestos fibers may be in excess of exposure limits; i.e., where insulation is being removed. Also where asbestos fibers are being generated from vibrations while scaling filters. Standard 29CFR 1910.93A(g)(1)(i).

D. Labels were not affixed to all raw materials, scrap, waste, debris, and other products containing asbestos fibers or to the containers as found throughout the plant. Standard 29CFR 1910.93A(g)(2)(i).

E. External surfaces (pipes, etc.) where insulation has fallen (onffloor of working areas throughout the plant) were not maintained to be free of accumulations as asbestos fiber. Standard 29CFR 1910.93A(h)(1)

F. Examinations relative to asbestos exposure not provided for employees engaged in demolition of asbestos insulation. Applicable to all areas. Standard 29CFR 1910.93A(j)(1).

G. Food eaten in areas where toxic materials are present (asbestos fibers, solvents, etc.) that could be injurious to health; i.e., most all lunch rooms (asbestos fibers on homemade cooking ovens, walls and ceilings). Standard CFR 1910.141(g)(3)(i).

Item 2 - Free Silica - possible free silica exposure exists while cutting fire brick using a dry process on the film furnace floor. Possible serious violation. Standard 29CFR 1910.93.

Item 3 - Nuisance Dust

A. Bauxite - possible exposure to bauxite dust in excess of permissible levels in the following areas: bauxite unloadin at all transfer points, tripper area, and bauxite reclaim tunnels.

B. Alumina - possible exposure to alumina dust in excess of permissible levels in the following areas: alumina loading (d transfer points and reclaim tunnels as well as alumina loadi operation (possible serious violation).

Item 4 - Noise - possible noise exposure in excess of permissible limits in the following areas: power house, all boiler areas, and on steam turbine floor, filn furnace floor, filter building while scalin filter tanks, sandblasting operation.

Item 5 - Solvents - improper handling and protection from solvent contact and exposure: Building 145 - solvent cleaning tank; Building 142 - electricalsshop; Building 142 - pump shop; Building 142 - tool room; Building 142 - varnish dip tank; Paint Shops and Spray Booths.

Item 6 - Caustic - possible caustic exposure in excess of permissible limits: Building 230 at the clinker grinding area (feed chute to mill); Filter Building (inside the filter tanks and at SOP filters); 45 Area - top of precipitators.

Item 7 - Hydrogen Chloride, Sulfuric Acid, Hydrogen Sulfide, and Chromate exposures should be checked at acid mix stations. Area 30.

Item 8 - No shielding while welding (repairing furnace onfkiln furnac floor).

Homer M. Cole

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HMC:slc

PLAINTIFF'S EXHIBIT
RMC-428

M E M O R A N D U M

January 4, 1973

TO: PLANT MANAGERS

FROM: E. C. Irby, M.D.

SUBJECT: Compliance with OSHA Asbestos Regulations

Within the next several weeks our Industrial Hygiene Department expects to have the capability of doing asbestos counts on air samples. This is being set up in conjunction with the Metallurgical Research Department. I am enclosing a Xerox copy of the asbestos regulations as published by OSHA in the Federal Register. As you can see, the Act was effective as of July 7, 1972, and allows for 5 fibers per cc over an eight hour time weighted average. This will become 2 fibers in 1976. No employee shall be exposed at any time to more than 10 fibers and then it goes on to specify the methods of compliance and protective equipment.

At this time, we have no asbestos counts and no serious estimates as to what the counts might be in our various asbestos using areas. Since personal sampling devices will be needed and there is a limit to the number of counts that can be performed, we feel the first order of priority should be at the work station of the carpenters in our cast houses where asbestos is machined and in the areas where asbestos cement is handled. To this end, our hygienist will be doing some studies at McCook and Liberty Mutual Insurance Company's hygienist plans some studies in Arkansas and Alabama. We also have plans to measure levels in the area where asbestos insulation either is being removed or installed as insulation for piping. If there are any other operations which might exceed the levels in the areas described above, we would very much like to hear from you and place these also at the top of our priority list. When we have sufficient measurements to be reasonably sure of our asbestos levels, we plan in conjunction with the Safety Department and Engineering Department, to help advise you concerning any measures which might be necessary to comply with the OSHA regulation. In the meantime it is hoped that the obvious portions of the Act will be complied with, such as using wet methods where possible, keeping asbestos bags closed when not in use, and disposing of them promptly when they are empty, and using all means of ventilation and exhaust which might be available.

E. C. Irby

E. Claiborne Irby, M.D.
Associate Medical Director