

MR. A. A. RAMBIKUR, PT. COMFORT OPERATIONS

THOMAS B. BONNEY

PITTSBURGH OFFICE - 7

MR. C. L. PITTMAN

PITTSBURGH OFFICE - 4 WPH

October 11, 1973

RE: PRECAUTIONS REQUIRED WHEN SPRAYING WITH FLAMEMASTIC

I have read with interest your letter of September 21 and the reports of environmental measurements taken by ARLI during the spraying of Flamemastic. Although these reports give this fireproofing material a clean bill of health, there were so many non-standard procedures described that we hesitate to accept the conclusions as valid without additional verification.

In view of the above, I am asking Al Rambikur if he would arrange with Sam Marshall to set up a test run during which some air samples could be collected. I will feel much more comfortable in relying on data collected by Al's trained and experienced staff.

Apparently, Flamemastic can be used and still meet the provisions of the Hazardous Air Pollutant Standards to EPA's satisfaction. Unfortunately, the OSHA regulations are more restrictive. Section 1910.93a (c)(2)(iii) clearly states that "Employees engaged in the spraying of asbestos...shall be provided with respiratory equipment...and with special clothing...." The supplied air respirator is the type of protection required for spray application. There are no qualifications based on the concentration of airborne asbestos generated. Right or wrong, OSHA has made the assumption that all spraying operations are bad.

If we are to get any relief from the restrictive provisions, we must first assure ourselves that exposures to asbestos during the spraying of Flamemastic are minimal. With this information in hand, we can be guided on how to proceed. In order to use less effective protection, we may very well require a ruling or variance from OSHA. If we have convincing evidence that respiratory protection is unnecessary, we can then determine if Alcoa should apply for a variance, press Dyna-Therm to apply or decide if either step is worth the effort.

Thomas B. Bonney

TBB:mb

cc: ✓ Mr. A. A. Rambikur, Pt. Comfort
Mr. S. W. Marshall, Pt. Comfort
Mr. C. F. Scott, Pt. Comfort

APC 005236