E. E. RUMBERGER

PITTSBURGH OFFICE - 6

TO MS. MARLENE JACKSON

PITTSBURGH OFFICE - 13

1984 May 21

M.W.J.
MAY 23 1984

RE: POINT COMFORT OPERATIONS
Ref: Asbestos Use - Blas Alvarado, Et Al

This letter is as an initial response to you regarding the request you have from Mr. Jeffrey B. McClure in his 1984 May 03 letter. I assume you will carefully review the attachments to determine their appropriateness to the matter.

It is somewhat unlikely that the Point Comfort plant will have maintained much in the way of any historic files which would shed much light on Alcoa's asbestos use and precautions employed at Point Comfort in the 1960s and early 1970s. In our corporate Industrial Hygiene Division in Pittsburgh, we do maintain rather extensive -- although not necessarily complete -- files of history dealing with activities in the plants.

We have reviewed our asbestos and Point Comfort files and are selectively submitting data which may be pertinent. The bottom line is that we believe that Alcoa's Point Comfort Operations acted in good faith in their preparations to protect employees from asbestos exposures in concert with what was known and the technology of the time.

The plants were advised in 1964 to protect employees from asbestos dust when sawing, drilling, or sanding asbestos-containing Marinite. They were expected to employ the then-accepted ACGIH threshold limit value (TLV) of 5 million particles per cubic foot (5 mppcf). The Occupational Safety & Health Administration (OSHA) published an Emergency Asbestos Standard on 1971 December 07, and Alcoa plants were promptly advised of the new requirements on 1971 December 23. Alcoa plants were advised of the specific protective measures covered in these requirements, including the use of respirators. This date in time marks the heightening of concern over asbestos exposures as a result of reported medical findings in the literature; and Alcoa has had a very high profile on employee protective measures, along with finding substitutes for asbestos, through the years that have followed. Industrial hygiene protective measures were implemented throughout 1972-73; and efforts to find substitutes started in about 1973 and continued throughout the 1970s. These efforts grew considerably and were especially active from 1978 to the present time. Successful substitutes have been found for most applications; and those where asbestos-containing materials are still required are highly controlled relative to employee exposures, along with the use of protective equipment (e.g., respirators, protective clothing, area containment, air sampling measurements, etc.). We believe Alcoa's efforts throughout this period have been exemplary.

ALCOA

PLAINTIFF'S EXHIBIT
AL-407

Attachment I -- Corporate "Newsletters" to Plant Industrial Hygiene Committee Chairmen. Two "Newsletters" in 1964 discussed the relative hazard to asbestos fibers when sawing the Marinite board used for headers in ingot casting and for trough linings. The plants were advised that time-weighted daily average exposures to the dust should be kept below .5 million particles per cubic foot, and short-term ceiling exposures were not to exceed 20 million particles per cubic foot. During the latter half of the 1960s, our files indicate that Alcoa was paying close attention to what was being reported in medical research literature. The third and fourth items in Attachment I involve the activities expected of Alcoa's plants as a result of the issuance of the OSHA Emergency Standard at that time.

Attachment II -- Point Comfort Activities. This grouping contains copies of the minutes of a number of Industrial Hygiene Committee meetings at Point Comfort between 1964-1970, reporting on their efforts to control asbestos exposures during sawing and machining Marinite through the use of localized exhaust and ventilating systems. Also enclosed are letters reporting environmental sampling measurements being made during 1972-73.

Attachment III -- Miscellaneous Corporate Correspondence on Materials, Substitutes, and Respirators. This attachment is highly selected miscellaneous correspondence during 1972-73 demonstrating the efforts the Company was beginning to conduct in regard to finding safer substitutes, as well as establishing the appropriate type of approved respirators to be used. This was only the beginning of heavy corporate activity that has continued ever since.

From the copy lists of the Point Comfort Industrial Hygiene Committee meetings in 1964 and after (Attachment II), we are working with Point Comfort's Personnel Department to determine where these employees may be at present. We can expect that many of the employees will have since retired. These are the people who could most likely speak authoritatively about the precautions taken in the late 1960s and early 1970s, presuming their recollections are reliable.

As to the use by job class of the various asbestos materials, along with the actual use of the materials purchased, we will attempt to provide further information (Items A and B in Mr. McClure's letter). Please keep us apprised of any future contacts and activities you have relative to this Class Action suit.

E. E. RUMBERGER

EER/eds
Attachments

cc: J. Damiano - Pittsburgh 6 (w/o attachments)