

FROM GARY C. GRIESBACH

TO SHOT TEAM MEMBERS

ROCKDALE OPERATIONS

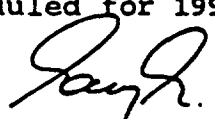
1993 June 21

RE: ASBESTOS AND TOXIC SUBSTANCE CONTROL ACT (TSCA) TRAINING

Attached are the Environmental Action Plans for 1993 which were developed due to our poor Environmental Audit scores on these two subjects. This is part of a report that Glade Lantz is submitting to Knoxville this month.

From our Industrial Hygiene perspective, it should be noted that we also rated poor in the 1991 External Safety/Industrial Hygiene Audit in these two areas.

Reminder: Our next External Safety and Industrial Hygiene Audit is scheduled for 1994 May.


GARY C. GRIESBACH

GCG/mcz

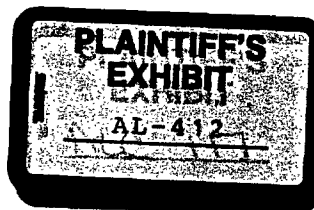
Attachment

cc:

R. M. Bartley
E. A. Kovach-Hayes
H. N. Mueller
R. W. Narvaez
J. E. Richter
M. C. Zotz

Note: Asbestos Mgmt. Team
will have its next meeting
on 93/06/24 per T. Hodges





ARD 004662

ENVIRONMENTAL REVIEW ROCKDALE OPERATIONS

CHEMICAL RELEASE/LAND MANAGEMENT SPECIAL SITUATION

ASBESTOS MANAGEMENT

Situation:

Rockdale Operations, including the smelter and the Power Plant, does not have a current survey of all asbestos-containing areas. The audit team observed minor exposures of insulation at the Power Plant which were not marked as asbestos or non-asbestos. Additionally, the facility has not implemented a coordinated asbestos awareness program. They have developed a draft of an awareness program, however, they are in the planning stages to develop a more comprehensive training program and procedures for supervisors.

Recommendation:

Continue efforts to develop and implement the training and awareness program for asbestos management along with the associated written procedures. ~~Since it is~~ generally assumed that the majority of unmodified insulation at the Power Plant is asbestos or refractor ceramic fiber (which Alcoa manages in a similar manner), the facility should conduct a visual inspection for areas of exposed insulation and characterize them as asbestos or non-asbestos, as appropriate. Furthermore, exposed asbestos insulation should be abated as appropriate.

Response:

The Asbestos Awareness Program has been developed and an employee handbook printed. Training will be conducted throughout the year. The Power Plant will investigate, on a regular basis, exposed insulation and determine the type insulation which is present and encapsulate, or replace, and mark as necessary.

ENVIRONMENTAL REVIEW ROCKDALE OPERATIONS

CHEMICAL RELEASE/LAND MANAGEMENT SPECIAL SITUATION

TSCA SECTION 8(c) AND 8(e) AWARENESS

Situation:

Rockdale Operations does not have a coordinated program for TSCA Section 8(c) and 8(e) reporting requirements, training, and awareness. All employees who may potentially be exposed to significant adverse reactions to health (Section 8(c)) or observe a substantial risk or injury to health or environment (Section 8(e)), should be cognizant of the applicable reporting requirements under these sections. Furthermore, supervisors and others who may report such allegations should have appreciation for the reporting requirements beyond the awareness stage.

Recommendation:

Develop and implement a coordinated training and awareness program for all employees who may encounter TSCA Section 8(c) and 8(e) conditions and a more extensive training program for supervisors and others who may be in a position to respond to such conditions or allegations.

Response:

1. An overview of the Toxic Substances Control Act (TSCA) is scheduled for presentation to managers at the Noon Safety Meeting on March 29th. Handouts to give an overview of TSCA will be distributed and sections 8(c) and 8(d) will be discussed.

D. E.

2. TSCA Posters are on order, upon receipt postings on all bulletin boards will occur, estimated completion March 15.
3. Employee training with emphasis on 8(c), (d) and (e) will be scheduled by mid-year.