

Brooks
FROM E. BROOKS PARKER
ROCKDALE WORKS

TO MEMORANDUM

1983 June 15

RE: OSHA INDUSTRIAL HYGIENE INSPECTION - 1983 JUNE 7 AND 8

On 1983 June 07 and 08, Mr. Greg Edwards, U. S. Department of Labor, OSHA, conducted a general industrial hygiene inspection of Rockdale Works.

Mr. Edwards was received by Mr. Gary Griesbach, Safety Manager, who convened the following people for an opening conference:

Gary Griesbach - Safety Manager
Brooks Parker - Environmental Superintendent
Allan Clayton - Chief Chemist
Ray Scott - Safety Engineer
Nelson Mueller - Safety and Health Administrator
Robert Willrich - President, United Steelworkers of America,
Local No. 4895
Weldon Henson - Vice President, United Steelworkers of America,
Local No. 4895 and Co-Chairman of Joint Safety
and Health Committee
John Thomas - United Steelworkers District Representative

Mr. Edwards stated the purpose of his visit and then asked for time to meet privately with the Union representatives.

After this meeting, Mr. Edwards reviewed Rockdale's Hearing Conservation and Respiratory Protection programs and records on Industrial Hygiene testing with Messrs. Clayton and Parker. He asked for and was given copies of the Respiratory Protection Program, the Hearing Conservation Program, a report entitled, "Evaluation of Catco System - Rockdale Works", and a noise level exposure summary by job classification at Rockdale. All pages of each document were stamped "Confidential".

Following this, Messrs. Clayton, Griesbach, Parker and Edwards made a quick tour of the plant on an electric scooter. Mr. Henson briefly joined the group, but was unable to participate because of previous commitments. The tour route included the Carbon Plant green mill, baking furnaces, Rodding Room, Potrooms, bath crushing area, ore unloading, Potlining Building 27, Ingot Plant and Properzi. Operation of the ore bucket filling stations and bath crushing facility and status of plans for engineering controls were explained as well as the completed projects for noise control in the Rodding Room and the Catco crane cab ventilation system in the Potrooms. After the tour, Mr. Edwards returned to Austin. Mr. E. E. Rumberger, Mr. Joe Damiano and the Corporate Safety office were notified of the inspection.

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The following day, June 08, Mr. Edwards returned for a more in-depth look at several operations in the plant. He was accompanied by Messrs. Henson, Parker and Damiano. The areas which were inspected were:

- Potlining, Bldg. 27
- Pot digging - Pot 1, Room 6
- Bath crusher, Courtyard 19
- Potroom ore bucket filling stations, Rooms 134 and 128.

Events which occurred in each area are discussed below:

Potlining - Bldg. 27

Interviewed Mr. J. D. Hawkins, Potlining employee. Mr. Hawkins described several problems found in the Potlining Department.

- Skin irritation and chemical burns associated with removing remnants of old potlining from potshells in preparation for their repair. Mr. Hawkins reported that the material is removed with chipping hammers and small pieces which break loose can come to rest on the employees' skin and cause irritation and/or burns. The cleaning operation was conducted only momentarily during the inspection. Mr. Edwards asked about the nature of the material and it was explained that during the smelting process, the potlining absorbs NaF which, when the pot is watered to facilitate digging, can react to form a caustic material. Mr. Edwards obtained a sample of the material for analysis. We split this sample with him and Mr. Damiano took it to Point Comfort for analysis.

Mr. Edwards observed the "make-shift" protective clothing (handkerchiefs, diapers, taped glove cuffs) and suggested that more adequate articles are probably available (coveralls, hoods, etc.).

- Potential exposure to asbestos associated with deterioration of transite pipe used in the potroom fume duct. Mr. Hawkins reported that old pieces of pipe when they are dropped, tend to break and crumble and generate asbestos dust. We did not see an example of such an occurrence, but Mr. Edwards suggested that if this did happen, employees should leave the material alone and immediately notify their supervisor and obtain appropriate protective and clean-up equipment so that the material could be safely and properly disposed of.

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- Mr. Edwards inquired as to the nature of hazard associated with C38 carbonaceous cement. It was explained that the powder fraction contained CTPV which could become airborne when material is added to the mixer. Respiratory protection is required as a precaution even though personal exposure tests have not indicated overexposure. Mr. Hawkins reported that the use of C38 cement had been recently discontinued.
- Mr. Edwards asked about JM375-L refractory material and what it contained. Although we don't have a Material Safety Data Sheet at Rockdale, Mr. Damiano was able to get the information from Point Comfort later in the day. Mr. Edwards obtained a sample of the material for analysis.

Pot Digging - Pot 1, Room 6

The group witnessed the pot digger demolishing the lining of Pot 1, Room 6. The operator was wearing a 3M8706 respirator and ear muffs. During the operation, a cloud of steam was generated when the digger exposed the hotter, inner sections of the lining. Mr. Edwards asked if we had conducted exposure tests for air contaminants. We have not. There were no other comments.

Bath Crusher

The group witnessed the operation of a Walden front end loader loading bath into the bath crusher hopper. The operator was wearing a 3M8706 respirator but the designated respiratory protection is 3M9920 or Airstream Helmet. Although the 3M8706 undoubtedly provides adequate protection, it is not approved by NIOSH for this use. When we reminded the operator that he was wearing the wrong respirator, he reported that it was his first day and he was not aware of that fact. Mr. Edwards later returned to take a photograph. Upon our return, the operator was wearing a 3M9920, so he was asked to pose for a picture wearing a 3M8706. Mark Schaefer, Public Relations, took Polaroid pictures which were later approved locally for release to OSHA.

Ore bucket filling stations - Rooms 134 & 128

The group witnessed the ore bucket filling operations in both Room 134 and Room 128 in order to observe the difference between an unvented bucket and a vented bucket. The demonstration revealed a significant difference; the 134 station created significantly more dust than the 128 station. We explained plans for upgrading the performance of the remaining P100 filling stations to the level of the 128 station as well as plans for upgrading T51 stations to performance level of the Room 26 station. It was noted that

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implementing the engineering controls was contingent upon obtaining approval for the expenditure of \$1.9 million. Mark Schaefer again took Polaroid pictures which were approved locally for release to OSHA.

No other areas of the plant were inspected.

During an informal wrap-up session, Mr. Edwards made the following comments:

1. Both Rockdale's Hearing Conservation and Respiratory Protection programs were good, although there appeared to be some educational and communications problems that weakened the respiratory protection program.
2. He will recommend that a citation be issued alleging failure to provide proper protective clothing and/or equipment to workers removing spent lining from pot shells and failure to provide an eye wash station in that area.
3. We may receive a citation alleging the use of unapproved respiratory protection in the bath crusher area.
4. We may receive a citation alleging a safety and/or housekeeping violation associated with dust generated during ore bucket filling in Room 134. Mr. Edwards did not feel that the operation posed a significant health problem. Mr. Edwards will review his findings with the area director and will inform us in a few days of their conclusions.

Corporate Industrial Hygiene and Safety personnel have been notified of these alleged violations.


E. BROOKS PARKER

EBP/mz

cc:

W. J. Drake
G. C. Griesbach
J. W. Havins
J. T. Hill
C. J. Hudson
G. H. Lantz
W. T. Washam, M. D.
J. L. Roddy
B. J. Turner
A. G. Clayton
H. N. Mueller
D. R. Scott
J. Damiano - Point Comfort
E. E. Rumberger - Pittsburgh
J. R. Archibald - Pittsburgh
Robert Willrich - USWA
Weldon Henson - USWA

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FOX001034

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Informational copy:
J. M. Everett
F. R. Hubbard
T. J. Randall
W. T. Eckert
H. E. Reagan/M. Schaefer

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FOY001025

File notes
w/ file:

on digger operator.

Bath Crusher - Front end loader
wearing wrong respirator - Should be
9920 - wearing 8706. Told to
operator + told him he should get 9920
He said it was his first day and
no one told him. Larry "Kupeducka"
David Munton was told + will give Larry
9920.

Line 8 Rm 134 - Ore bucket filling station
Really bad

Rm 128 - Much better

Explained our Plans for 1-6, 7+8

Hear Cons - Good

Resp Prot - Good Enforcement?

Can expect citation on failure to provide
adequate protective equip + an
upwash in pot hole cleaning area.

Maybe wrong respirator being worn at
Bath crusher.

Possible citation for restricted visibility
during ore bucket filling - maybe
housekeeping standard.

Greg Edwards - CCHA - Austin

06/07 Ind. Hygiene Survey - General
Opening conference

Griesbach, Mueller, Scott, Clayton, Parker
Willrich, Henson, John Thomas

Reviewed CCHA Log

Reviewed Hear. Cons Prog & Keep Prot Prog

Reviewed sampling data - Noise & Keep Prot.

Brief plant tour on scotch

06/08 Detailed tour - Damiano, Edwards, Henson, Parker
Potlining - J. D. Hawkins

1. Caustic burns during shell cleaning

2. ~~Asbestos exposure when~~

Edwards suggested better protective
equipment - coveralls, hoods

2. Asbestos in transite pipe - crumbles
when old - potential exposure during
clean-up

Edwards suggested special procedure
for clean-up - don't touch, call
supervisor, get appropriate
protective equip.

3. Edwards asked for MSDS on
JM375 + E34

Hawkins said we no longer use
E34, just JM375

Pot digging - observed Pot 1 Run 6

breaking & digging - a lot of steam

Edwards asked if we had run air test

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83-06-16 - Called OSHA + talked to Michi Nicholas, D. N. Supervisor, about proposed citation for failure to provide proper protection equip to potliners cleaning shells before they go to the wash station. Found that she was aware of protective clothing available, but ~~that~~ OSHA felt that even a bigger face shield would not prevent material from getting down employees neck. I also told her that we had been unable to find any record of a burn type injury associated with that job.

Later, Margaret completed a computer search and found 3 such injuries
Charles Pratt - 80-12-10 - piece of material got between hard hat lining + face + caused burn.

J D Hawkins - 81-12-17 - piece got in glove and caused burn.

Ben Urbanek - 82-01-20 - piece "lodged" inside his pants and caused burn.

Reported this to Greg Edwards, OSHA, on 83-06-17