

FILE - 710 A. TESTOS



Shell Oil Company
Interoffice Memorandum

JUNE 10, 1980

FROM: J. G. PRATT, JR.

TO: R. J. SWOFFORD

SUBJECT: INSULATION SYSTEM REPAIRS TO MEET OSHA REGULATIONS

SLD	FAE	HMM	JDR	KCC
HEALTH & SAFETY OPERATIONS				
JUN 11 1980				
	PJW	BJD		FILE

PLAINTIFF'S EXHIBIT

SH-716

As noted in TWX No. OSP 5796, dated June 5, 1980, we have enclosed some additional data on the project including the original note with Mr. R. J. O'Brien's concurrence with the expenditure for 1980.

Although it is recognized that a problem exists with the insulation and approval has been granted to begin the work, a number of questions have been raised during the course of obtaining the approval. Most of the questions concern the scope and cost of the work in view of the apparent difficulties in relating the insulation condition to airborne particulate concentrations. (Note the enclosed article from the Houston Post. Although it was written about asbestos in buildings, the same questions apply to outdoor installations.)

We would like to suggest that a meeting be held prior to the start of the full field program to review:

1. The criteria proposed to determine the repairs to be made.
2. The field procedures and inspection to control the work and to assure that the criteria are met.
3. The coordination procedure with Head Office - Health and Safety - Operations Department to assure that current H&S interpretations are incorporated over the full life of the project and that the experience is available to assist other locations.

Head Office attendees at the meeting should include representatives of Health and Safety - Operations and Manufacturing Maintenance Support. T. J. Hayes of Site Development and General Facilities - P&A should also be included since he coordinated the initial approval process.

Enclosures

TJH:IHJ

cc - Messrs. R. L. Brunner
R. H. Brown
R. P. Frutiger - DPMC

THIS COPY FOR

LAM 016856

DPMC-10600

May 7, 1980

GENERAL MANAGER
MANUFACTURING

MAY 25 '80

1/11
1. ~~F. T. Skowronski~~
2. ~~R. L. Love~~
3. ~~D. McCormack/W. H. Simpson~~
4. ~~A. J. Martiny~~
5. ~~R. E. Hall~~
6. ~~W. A. Carpenter, Jr.~~ *use 6-2*
7. ~~R. J. O'Brien~~
Return to T. J. Hayes

SUBJECT: ASBESTOS INSULATION REPAIRS TO MEET OSHA REGULATIONS AT
DPMC-NORTH

Deer Park Manufacturing Complex has requested authorization to spend \$1.7MM in the remainder of 1980 on an unplanned major special expense to repair damaged insulation. The damaged insulation allows asbestos fibers to be released into the air in excess of the OSHA limits.

The entire program to bring the DPMC-North area into compliance is currently estimated to cost up to \$5MM. \$1.7MM of unplanned expense to be spent in 1980 as requested with additional budgeted planned major special expenditures of \$1.6MM in 1981 and \$1.7MM in 1982.

It is recommended that the program be handled in three separate parts, rather than as one large unplanned project, for control purposes. Compliance with OSHA standards depends on the amount of airborne particulates rather than the condition of the insulation system per se. To a certain extent, this is a pilot program to determine exactly how much repair must be done to achieve the proper ambient conditions. There is not enough energy savings to justify the work, therefore, the goal is to repair only as much insulation as necessary to reach compliance. Head Office - Health and Safety Department has participated in the preparation for this program and they will continue to work with DPMC on the scope of the repairs and their effectiveness. Placing the last two-thirds of the work in the 1981 and 1982 budgets will facilitate an annual cost update and cost/effectiveness review.

If you concur, we will advise DPMC to go ahead with the 1980 portion and insert the 1981 and 1982 items in the appropriate STOP forecasts.

T. J. Hayes
T. J. Hayes,

Attachment

CONCUR

R. J. O'Brien
R. J. O'Brien

R. L. Brunner
R. L. Brunner

LAM 016857

DPMC-10601

April 28, 1980

MR. J. C. SEYMOUR, JR.

Re: DPMC Insulation Repair
(Wire of 4/23/80)

Brook:

The guidelines we have established for this kind of work are that replacement is justified from a safety and health standpoint if 1) monitoring data show excessive potential exposure or 2) insulation is not covered in areas where people are likely to rub against it and cause it to sluff off (not in pipe racks, isolated locations, etc.).

Per discussions with Frutiger this (2) is the justification here. Therefore I support the expenditure.

R.L. Brunner / lb

Attachment

cc: Messrs. R. H. Brown
W. A. Carpenter, Jr.
T. J. Hayes
D. C. Mc Cormick

R. L. BRUNNER

LAM 016858

DPMC-10602

the Apex Education
urban school districts
ation lawsuit filed
Independent School

Bass said, "when you say 'let's
cooperate,' this might 'us into the
lawsuit. Before the fa ou might be
admitting liability. I wonder how the
county attorney would feel about that?"

don't, it's their duty to get in touch with
us."

Lyons agreed: "I'll lay you odds that
they know about every bit of that

Fellow court members reminded hi
that if the federal attorneys want coup
"public" records, they will merely su
poena them.



John almost two tons of the can delivery in the

Study indicates asbestos hazards less than believed

By HAROLD SCARLETT
Post Reporter

A five-year study shows asbestos materials in schools and other buildings are much less of a cancer hazard than previously believed, a researcher reported Thursday.

The study by industrial hygienist James T. Schirripa challenged the Environmental Protection Agency's approach to the problem.

Schirripa said his study shows that removing asbestos material from buildings — which releases the tiny fibers — in many cases would result in more cancers than leaving the material where it is.

The study, he added, also showed that occupants of unrenovated buildings generally would die of other causes long before they developed cancer from the low level of fibers found.

"Our studies begun in 1975 generally demonstrate for the areas examined a time-to-tumor risk of well over 100 years, a risk far smaller than previously believed," he said.

Schirripa, of Industrial Hygienics Inc. in Huntington, N.Y., reported his findings to the American Industrial Hygiene Conference. The association of industrial and government hygienists is meeting this week in the Albert Thomas Convention Center.

Schirripa said his firm conducted tests in 100 schools, office buildings, industrial plants, hospitals, ships and a retail store.

The study was based on 40 of the tests.

The hygienist claimed the tests, the most sophisticated yet conducted, asbestos fiber levels inside buildings.

In most buildings, Schirripa reported the tests showed only 0.1 to .01 fibers per cubic centimeter of air. By comparison the asbestos standard of the Occupational Safety and Health Administration is fibers per cc of air, he said.

Schirripa said the EPA suggests such careful measurements to assess asbestos hazards in schools, but relies on a visual scoring system. He said the "highly subjective" approach can result in the wrong corrective actions.

He said "doing nothing" is often the correct reaction, because asbestos removal, even with wetting and other safeguards, can generate more than 10 fibers per cc of air.

"Our formula shows that the greater rate of potential cancer cases as a result of continuous exposure in general occupancy buildings was 112 cases per million in the population over 40 years and 2,707 cases in 75 years. That's the risk of doing nothing," Schirripa said.

"The risk of doing something, removing the material, was 20 times greater (2,245 cases per million) in 40 years and 4.5 times greater (12,349 cases) over a 75 year period."

He said the study reinforces his fear that society may be spending too much money, with too little thought, on highly exaggerated risks.

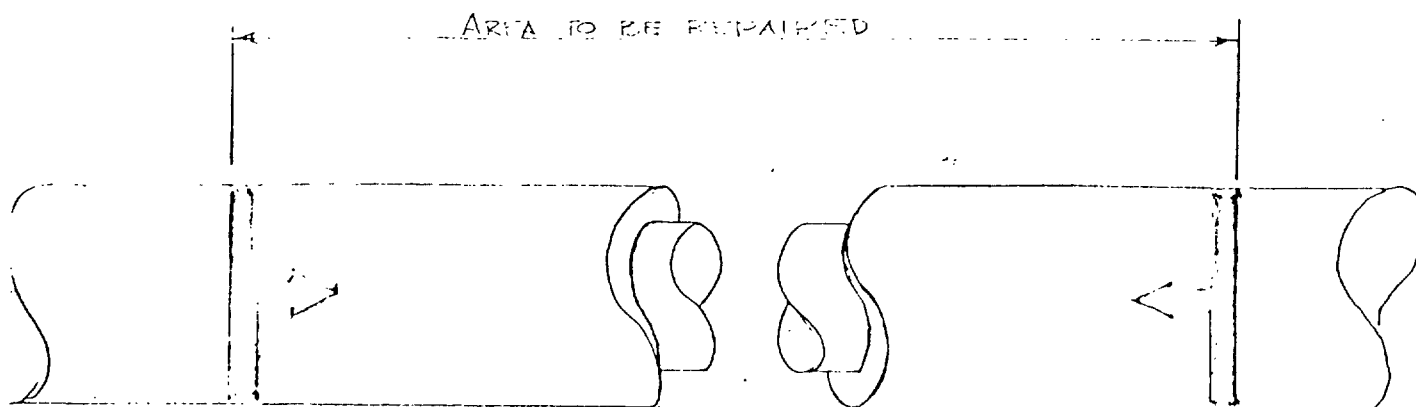
DPMC-10603

Initial systems planned for treatment center

An Incinerator and a British process that converts hazardous wastes into "synthetic rock" will be the first systems installed at a new industrial

Initial construction on a 30-acre processing complex will include a laboratory, administration building, storage tank, and other facilities.

LAM 016859



COLOR CODE FOR TYPE REPAIR

- A. WHITE — INSTALL ALUMINUM COVER OVER ASPHALTIC FELT
- B. YELLOW — REPAIR WASHED-OUT AREA IN INSULATION COVERED WITH ASPHALTIC FELT USING CERA BLANKET/MUD-IN FOLLOWED WITH COMPLETE ALUMINUM WRAP.
- C. RED — REPAIR OR REPLACE ALUMINUM COVER
- D. ORANGE — REPLACE WEATHERPROOFING ON TEES, ELLS AND VALVES.
- E. GREEN — REMOVE INSULATION AND REINSULATE/COVER

LAM 016860

DPMC-10604

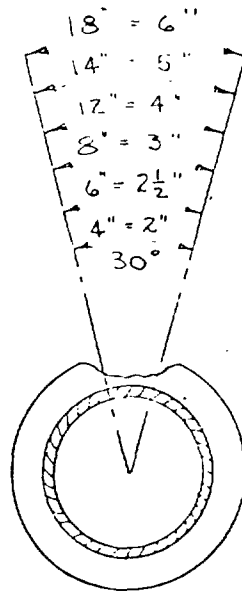


FIGURE I

REPAIR PROCEDURES

- A. ASPHALTIC-FELT COVERED INSULATED PIPING WITH INSULATION EXPOSED IN WIDTHS TO THE EXTENT GIVEN BY FIGURE I SHALL BE REPAIRED AS FOLLOWS:

INSTALL COMPLETE WRAP OF 26 GAUGE (.016" THICK) PLAIN ALUMINUM, WITH 2 INCH MINIMUM OVERLAP, AROUND THE EXISTING INSULATION AND FELT COVER. THE ALUMINUM SHALL HAVE A PAPER MOISTURE BARRIER INSIDE. COVER TO BE Banded ON 12 INCH CENTERS WITH .015" X 1/2" STAINLESS STEEL BANDS.

- B. ASPHALTIC-FELT COVERED INSULATED PIPING WITH INSULATION EXPOSED IN WIDTHS GREATER THAN THAT SHOWN BY FIGURE I SHALL BE REPAIRED AS FOLLOWS:

FILL IN VOIDS WITH CERA-BLANKET (6# DENSITY) AND MUD-IN TO NEAR INSULATION THICKNESS WITH 1-GPFF INSULATING COMPOUND. WRAP OVER REMAINING ASPHALTIC-FELT AND REPAIR WITH 26 GAUGE (.016 INCH) PLAIN ALUMINUM. NEW COVER TO HAVE 2 INCH MINIMUM OVERLAP. COVER TO BE Banded ON 12 INCH CENTERS WITH .015" X 1/2 INCH STAINLESS STEEL BAND. ALUMINUM SHALL HAVE A PAPER MOISTURE BARRIER INSIDE.

- C. REPLACE OR REPAIR DAMAGED ALUMINUM COVERING WHERE INSULATION IS EXPOSED.

DPMC-10605

LAM 016861