

SHELL CHEMICAL COMPANY

REFERENCE 001

SHELL CHEMICAL MFG. & DISTRIB.			
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PLM	TE	ENV	✓
NT	ONE	JAM	
VWW			✓
FILE	I H-7		

DATE MAY 23, 1973

TO MARIETTA PLANT -
PROJECTS SUPERINTENDENTFROM MANUFACTURING COORDINATOR -
PROJECT P/MCUSUBJECT ASBESTINE 3X RELATED
ACTIVITIES

Numerous questions have been raised with regard to use of Asbestine 3X as a feedstock in the Marietta Compounding Unit currently under construction. A brief summary of activities pertaining to Asbestine 3X use plus a proposed strategy for preparing to handle Asbestine 3X is outlined below for information and review by various parties.

RD. → By copy of this memo, I request (1) review of operational and monitoring aspects by Marietta Plant, (2) review of business aspects by Elastomers Business Center, (3) review of safety law compliance aspects by Environment and Safety - Plans and Analysis - Manufacturing and Distribution, and (4) a general review of the outlined approach by all parties.

Raw Material Selection

Asbestine 3X is currently our only approved replacement for Snocal 50, a Kraton R compound feedstock available only on the West Coast. Primarily because of the shipping costs from the West Coast to Marietta, Snocal 50 costs \$29.30 more per ton than Asbestine 3X (\$78.80 vs. \$49.50). At estimated MCU volumes for 1974 and 1975, this represents \$35,000 and \$25,000 respectively. Additionally, reliability of the Snocal 50 source at increased volumes and in bulk is considered questionable.

Balanced against the "negatives" of Snocal 50 use are the "negatives" of using a feedstock that contains 25% Tremolite, a material that is defined as "asbestos" under current OSHA regulations. Although the producers of Asbestine 3X are currently attempting to convince governmental agencies that Tremolite is not asbestos, we must proceed on the basis that Asbestine 3X contains asbestos unless and until governmental agencies decide otherwise.

In view of the "negatives" of Snocal 50 and Asbestine 3X, it appears highly desirable to qualify a "non asbestos containing" Asbestine 3X equivalent with the economics of Asbestine 3X. There is currently underway an Elastomers Business Center initiated program to define alternative feedstocks for Kraton R products. From discussions with W. M. Halper of Plans and Analysis, I understand he, R. H. Mann of E.T.C. and R. L. Parnell of Purchasing plan to assign a high priority to qualification of an Asbestine 3X equivalent.

In case an economic and process equivalent of Asbestine 3X cannot be located, we are preparing to handle an "asbestos" containing material as outlined in the following paragraphs regarding construction, procedures and monitoring.

PLAINTIFF'S EXHIBIT

SI-3443

ABS-027338

Construction

JAM → Reference April 6, 1973 Environmental Protection Agency standards as disseminated by Manager - Environment and Safety - Plans and Analysis - Manufacturing and Distribution in his memo of April 24, 1973, attached. Per paragraph 61.07 of the E.P.A. regulation, we must apply to E.P.A. for approval of our asbestos handling facilities. Required data for the application will be forwarded to Marietta for their submittal.

? → Paragraph 61.09 and 61.12 of the E.P.A. regulations state that the Administrator must be notified 30-60 days prior to startup of the asbestos handling facility and within 15 days after the actual startup date. Startup is interpreted to mean the beginning of operation with asbestos. In the case of MCU, we plan to start-up on Snocal 50 to avoid introducing feedstock variances during startup activities. Changeover to Asbestine 3X is anticipated 3-6 months after startup. It is at that time that the Marietta Plant should notify the E.P.A. Administrator.

Operating Procedures

Reference attached National Insulation Manufacturers Association, Inc. February 7, 1972 suggested guidelines for handling asbestos. Techniques outlined therein will be incorporated into our operating and maintenance procedures. Items covered will include:

- a) Provision of respiratory equipment - approved equipment per the memo will be provided for maintenance, for feeder calibration, for equipment line up changes, etc.
- b) Production equipment scheduling - insofar as production schedules, etc. permit, Asbestine handling equipment will be retained in that service and changes will be minimized.
- c) Use of sealed containers - calibration, bin emptying, etc. will be to closed containers.
- d) Clean up techniques - dust will be vacuumed, not swept, etc.

The above obvious techniques, consistent with good housekeeping and operating practice on any feedstock, will be initiated and refined during early operation on Snocal 50. It is recommended that during that period a representative from Environment and Safety - Plans and Analysis - Manufacturing and Distribution visit the plant to audit the operation and outline any additional procedures that may be required for satisfactory operation.

Monitoring

It appears that two types of monitoring will be required if/when we commence operation with Asbestine 3X; monitoring of conveying system filter effluents to confirm acceptable impact on our environment per E.P.A. standards and monitoring of procedures to confirm acceptable impact on our employees per OSHA standards. When referring to procedure monitoring, I mean air sampling in an employee's working area when he is performing work that could cause exposure unless performed correctly (bin maintenance, feeder calibration, movement of calibration containers, etc.)

Monitoring to confirm compliance of the effluent filtering system will be primarily visual in view of Paragraph 61.22 Emission Standard of "no visible" emissions to the outside air. Per discussions with Environment and Safety, the absence of a numerical standard and test method for asbestos determination in the E.P.A. regulation indicates that E.P.A. is relying on the visual check plus air cleaning design criteria in Paragraph 61.23 to protect the environment from asbestos.

Procedural monitoring for employee safety, as set forth in an OSHA reply to another company asking the question, should include a sufficient number of initial determinations to confirm compliance followed by monitoring at least every six months to confirm that equipment and procedures remain up to standard. This would include monitoring in the vicinity of the Asbestine 3X feeder during normal operation (steady state data) plus monitoring of special activities mentioned above that could cause exposure unless performed correctly.

Discussions with the Deer Park Plant confirm that the above approach is similar to that taken by them in monitoring two of their operations in which they handle asbestos. In both of their operations, test data confirmed that they are operating well within safe guidelines.

As stated in the paragraph on Procedures, we will have some time to optimize our systems/procedures prior to emission testing. During the first few weeks of operation, when fortunately we'll not be handling Asbestine 3X, we can visually check our equipment and procedures and correct problems as we observe them. When the problems are corrected and procedures are refined, we can then proceed to emission testing. By that time, we will have accumulated some data on duration of activities that could introduce exposure, etc. and should be in a position to quantify acceptable limits per OSHA figures.

Monitoring (Con't.)

? → Confirmation of "safe levels" of contaminants in the air via emission testing coupled with compulsory use of respirators when performing calibrations and similar tasks would place us in a safe position with regard to use of Asbestine 3X. If air samples indicated borderline data, we will have to define methods for further improvement or consider annual medical testing for the 4-8 employees affected. With correct procedures, however, it appears unlikely that air samples will indicate an unsafe condition.

In summary, it appears that we have an acceptable program for (1) selection of the best MCU feedstocks and (2) coping with Asbestine 3X if it emerges as the best feedstock. Review of the situation, the various trade-offs to consider, etc. will continue so receipt of any new information, etc. as it becomes available will be appreciated.

C. W. Kiser
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CWK/sc
Attachments

cc: w/o Attachments
Marietta Plant - E. H. Mergens
Manufacturing & Distribution - T. P. Martin
Manufacturing & Distribution - R. W. Fourie
Manufacturing & Distribution - ~~R. L. Maycock~~
Elastomers Business Center - J. B. Ashton
Engineering - Construction - H. D. Craft
Elastomers Technical Center - J. Cotton
Elastomers Technical Center - R. L. Mann
Purchasing - R. L. Parnell

ABS-027341