

FROM: C. A. CARTER

TO: L. D. RUSSELL

1989 JANUARY 19

RE: ASBESTOS

In response to Mr. Diederich's January 09 letter on the captioned subject, I have the following comments.

1. Are we in violation of any regulations?

All asbestos waste is going to a special section of the County landfill in full compliance with the regulations.

We have been utilizing certified asbestos removal contractors for larger-scale asbestos removal jobs for the last five years. We are in full compliance with the regulations on these jobs.

We are probably not in compliance with personal protective requirements of our maintenance people working on small-scale, short-duration operations. This would include such jobs as repairing or replacing a valve in a steam line. We have been trying for some time to conduct air monitoring on this work to determine the level of asbestos exposure and hence, the appropriate level of protection for our employees. However, since this work is usually done on an emergency basis and almost always on the weekends or off-shift, we have not been successful. However, we have decided to proceed with a comprehensive six (6) hour training program in April and to cover all of the protection options. This will put us in full compliance with the regulations on these jobs.

2. Are we proactive enough?

I believe that we are very proactive on the elimination of asbestos from our plant. Over the last ten years, we have successfully eliminated virtually all asbestos from our operating supplies and spare parts. We are currently working on a plan and cost estimate to remove all remaining accessible asbestos from the plant during 1989 and 1990. Since this will be a major expenditure on the order of \$500,000, it is imperative that our corporate management be supportive of our plan. I sense from Mr. Diederich's letter that the support is in place at this time.

Conrad
Conrad Carter

cc: T. W. Baugh

FILE: IH\AIR\ASBESTOS\DIEDERICH

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