PLAINTIFF'S EXHIBIT

AL-2388

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TO DR. B. D. DINMAN
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file Rockdale (x ref'd copies Pt Comfort file)

1977 August 24

RE: ROCKDALE AND POINT COMFORT VISITS - GENERAL IMPRESSIONS

As a result of last week's tours of the Rockdale and Point Comfort Operations, meeting with the joint Safety and Health Committees and talking with various management personnel, I received some general impressions of situations common to the two plants that I would like to share with you. It may be profitable to keep these in mind during our subsequent plant visits.

1. There appears to be a minimum amount of concern relative to the need for controlling nuisance dusts. Granted it is difficult for anyone to make a strong case for this need on the basis of possible health effects. I suspect this is the main reason for failure to control. On the other hand, there are additional reasons for taking action that have been largely ignored. I refer to safety (reduced visibility), possible violations of air pollution regulations, attendant increased maintenance costs, and employee relations.

2. It appears that air sampling data (for determining employee exposures) has not been used to its greatest advantage in determing whether or not real problems exist.

3. It appears that the less a joint committee considers itself union or management and the more it considers itself a cohesive Alcoa unit that exists for the purpose of solving problems of common interest, the more effective it becomes.

4. It appears that the joint safety and health committees have not fully benefited from the establishment of a list of their priorities for problem areas or situations that require control. I suspect that plants will seldom be in a position to solve all of their environmental problems within an optimum time frame. This being the case, a priority system, periodically reviewed and modified, will permit them to place available funds where they will do the most good.

5. Lack of communication continues to be a problem. Sometimes we are told; sometimes we are not. Sometimes we hear; sometimes we do not. At both Point Comfort and Rockdale, the union members were not aware of many activities contemplated or underway to control environmental problems. Management contended that, at least in some cases, the union members had been informed. I have no reason to doubt that such was the case. Regardless of causation, the situation does point out a need for an extra effort, or perhaps a repetitive effort, in communicating. A regular review of the committee's priority items, pointing out the progress made on each, might be helpful in bridging the communications gap.

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6. There appears to be need for a more coordinated approach to engineering controls. There are many common problems that exist or have existed in our plants. Some solutions may already be available. In many instances there appears to be a tendency for each plant to solve its own problems in its own way and without knowledge of the experience of other plants. To me it appears that a very useful and money-saving service could be performed if plants, when they are confronted with a difficult environmental problem, could contact a coordinating unit within the company who would be able to advise them if solutions are already at hand or, if not, to assist in finding them. The Environmental Engineering Division appears to be the most logical unit to provide such coordination. The corporate industrial hygienists can also be of help if they alert the Environmental Engineers to unsolved problems observed in the plants that they visit.

7. I seem to detect a reluctance of our plant management people to look at an environmental problem in its totality. For example, I can refer to the severe dusting that occurs along Point Comfort's bauxite conveyor belt. There was little apparent concern about any but the industrial hygiene problem. However, in addition to an employee exposure to nuisance dust, there also exists potential problems in safety (from reduced visibility), air pollution (fugitive dust), employee relations, and equipment malfunction. To determine how serious the need for corrective action, one must consider all facets. It doesn't appear prudent to solve only the industrial hygiene and employee relations problems by, for example, erecting a dust-free enclosure for the exposed employees if additional dollars were subsequently required to control the dust at its source (the solution of all facets of the problem) in order to conform with air pollution regulations.

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