REYNOLDS METALS COMPANY
SHERWIN ALUMINA PLANT

HEALTH & SAFETY DEPARTMENT

REYNOLDS METALS COMPANY, P. O. BOX 9911, CORPUS CHRISTI, TEXAS, 78469
TELEPHONE (512) 777-2256 FAX (512) 777-2607

October 9, 1995

Aluminum, Brick and Glass Workers
International Union, Local 235
P. O. Box 1601
Corpus Christi, Texas 78403

RE: Response to Inquiry of August 18, 1995

Members of Local 235:

In the spirit of Union/Company cooperation, and in the interests of cooperation to enhance the health of Sherwin Plant employees, the Company is providing answers responsive to the questions listed in the above-referenced Union letter. As previously indicated, the company is prepared to meet and discuss the issues raised in this letter and others you may have. It is hoped that these answers and the resulting dialogue will be constructive and in furtherance of the health of Sherwin Plant employees.

(1) *What are the applicable government standards for exposure to floating asbestos fibers? What are the standards for aluminum oxides? Electromagnetic fields? Coal tar pitch volatiles?*

The current Mine and Health Administration's standards for airborne asbestos fibers is 2 fibers per cubic centimeter of air when averaged over an 8-hour day. In addition, MSHA uses a ceiling limit of 5 fibers per cubic centimeter.

The current Occupational Safety and Health Administration's Standard for asbestos fibers is 0.1 fibers per cubic centimeter of air when averaged over an 8-hour day. In addition, there is a 30-minute excursion limit of 1.0 fiber per cubic centimeter.

The MSHA standard for aluminum oxide is 10 mg/m^3. The OSHA standard for aluminum oxide is 15 mg/m^3.

Electromagnetic fields are not currently regulated by MSHA or OSHA.

The MSHA and OSHA standard for coal tar pitch volatiles is 0.2 mg/m^3, measured using OSHA Method 58.

(2) *How long have these standards been in effect? Have they changed over time?*

The above MSHA standards were established as a result of the passage of the Mine Safety and Health Act in 1977. OSHA regulations have been in effect since December 31, 1970 with the passage of the Occupational Safety and Health Act. Yes, some standards have changed over time.

(3) *What are the asbestos dust count results for the following areas at the Sherwin Plant:*

(a) the power house
(b) the digestion area
(c) the clarification area
(d) the filtration area
(e) the evaporator area
(f) the break, eating, locker room and shower areas

When did Reynolds first begin measuring asbestos levels in the air at the Sherwin Plant?

An independent contractor, Northwest Envirocon, has collected over 500 asbestos air samples throughout the plant between April 1990 and the present. The vast majority showed concentrations below the limit of quantitation. All but two were below 0.1 fibers per cubic centimeter. These two were 0.12 and 0.126 fibers per cubic centimeter. A copy of these results can be found as Attachment A.

The first asbestos air samples of which we are aware were collected at the Sherwin Plant in March, 1974.

(4) *What areas of the plant today have asbestos in place? What areas have undergone asbestos abatement? Is Reynolds planning on abating or removing asbestos from any other areas inside the Sherwin Plant?*

The Plant has conducted an asbestos inspection that identified and labeled all areas of in-place asbestos at the plant. Many areas have undergone asbestos abatement, and more asbestos abatement will be conducted in the future. Every area of the plant has an asbestos book which identities the specific locations of asbestos for that area. The book is updated after each abatement in order to keep an accurate record of asbestos-containing materials. An example of the area asbestos books can be found in Attachment B.

(5) *What efforts has Reynolds taken at the Sherwin Plant over the years to comply with applicable state and federal regulations on asbestos exposure? Has Reynolds conducted an audit on the potential hazards at the plant for all types of dust, metals, fumes, and gases?*

The Sherwin Plant has had on-site plant safety and health personnel. In addition, Corporate has maintained health and safety personnel. These personnel conduct inspections to assess potential exposure to chemical and physical hazards, including asbestos. A comprehensive industrial hygiene study was conducted in July 1993. A copy of the report is attached as Exhibit C. (Asbestos was not a part of that study because the Northwest Envirocon test results demonstrated that asbestos exposure was not a hazard at the plant.). In addition, the Mine Safety and Health Administration visits the Sherwin plant every six months to conduct a comprehensive inspection of the plant. Attachment D is an example of a report completed by the plant in 1974 following an inspection by the Mine Enforcement and Safety Administration (the predecessor to MSHA).

(6) *When did Reynolds first begin requiring the use of asbestos-free products for insulation and other purposes at the Sherwin Plant? This is especially important to our younger members.*

To the best of our knowledge the Sherwin Plant started using asbestos-free products for re-insulation in the late '60's to early '70"s.

(7) *What steps does Reynolds recommend for minimizing the worker's exposure to asbestos? Does Reynolds already have an asbestos training program or risk reduction program in place? If so, we would like to strengthen the program so that everyone can better protect their health.*

Enclosed as Attachment E is a copy of the current Asbestos Program for the Sherwin Plant that is responsive to these questions.

Sincerely,

Arlon Boatman

Arlon Boatman
Manager, Health & Safety
Sherwin Alumina Plant

Attachments:

A Copy of the results of Northwest Envirocon's survey for area air samples from 1990 to present.

B Example of area asbestos books that identifies asbestos locations.

C July 1993 Industrial Hygiene Survey results.

D Plant report following MESA inspection in 1974

E Copy of current Asbestos Program