



# INTER-OFFICE CORRESPONDENCE

To: R. Casper

Date: July 22, 1976

From: Z. G. Bell, Jr.

Location: 10 West

Subject: Mock OSHA Inspection -  
Asbestos

A Mock OSHA Inspection was made on July 14, 1976 beginning at 11:00 a.m. and completed at 12:45 p.m. Messrs. T. Hatfield, E. J. Tullier, D. Savoy and you accompanied myself and P. J. Snyder on this inspection. The following items are alleged violations of 29 CFR 1910.1001 Asbestos Standard, 1910.134 Respiratory Protection and 1910.22 General Requirements (OSHA).

| ITEM<br>NUMBER | STANDARD REGULATION<br>OR SECTION<br>ALLEGEDLY VIOLATED                                                                                                                                                                                                                                                                                                                                                                            | DESCRIPTION OF<br>ALLEGED VIOLATION                                                                       | SUGGESTED DATE<br>FOR CORRECTION<br>OF ALLEGED<br>VIOLATION |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 1.             | 29 CFR 1910.1001<br>(C)(2)(i) and (2)(ii)                                                                                                                                                                                                                                                                                                                                                                                          | <u>Cell Removal Area</u>                                                                                  |                                                             |
|                | (2) <i>Work practices—(i) Wet methods.</i> Insofar as practicable, asbestos shall be handled, mixed, applied, removed, cut, scored, or otherwise worked in a wet state sufficient to prevent the emission of airborne fibers in excess of the exposure limits prescribed in paragraph (b) of this section, unless the usefulness of the product would be diminished thereby.                                                       | (1) Asbestos rope removed from container without methods specified to reduce emissions.                   | August 11, 1976                                             |
|                | (ii) <i>Particular products and operations.</i> No asbestos cement, mortar, coating, grout, plaster, or similar material containing asbestos shall be removed from bags, cartons, or other containers in which they are shipped, without being either wetted, or enclosed, or ventilated so as to prevent effectively the release of airborne asbestos fibers in excess of the limits prescribed in paragraph (b) of this section. | (2) Asbestos rope cutting without dust suppression techniques being used.                                 | August 11, 1976                                             |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                    | (3) Asbestos rope cutting in bridge between K302 and K303 without measures to control airborne emissions. | August 11, 1976                                             |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                    | <u>Fluffing Area</u>                                                                                      |                                                             |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                    | (4) Asbestos removed from bags by puncturing for quality control and bags not resealed.                   | July 15, 1976                                               |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                    | (5) Torn bags of asbestos not properly resealed in storage area.                                          | July 15, 1976                                               |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                    | (6) Improperly maintained enclosure for fluffing - rubber flaps missing improperly maintained.            | July 21, 1976                                               |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                    | <u>Cell Auxillary Bay Area</u>                                                                            |                                                             |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                    | (7) Asbestos transferred from container to drums without control measures to suppress airborne emissions. | August 4, 1976                                              |

BB 0000079

| ITEM<br>NUMBER | STANDARD REGULATION<br>OR SECTION<br>ALLEGEDLY VIOLATED                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | DESCRIPTION OF<br>ALLEGED VIOLATION                                                                                                                                                                                                                                                                                                                            | SUGGESTED DATE<br>FOR CORRECTION<br>OF ALLEGED<br>VIOLATION                         |
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| 2.             | <p>(C)(1)(iii) and<br/>(C)(2)(iii)</p> <p>(iii) <i>Particular tools.</i> All hand-operated and power-operated tools which may produce or release asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section, such as, but not limited to, saws, scorers, abrasive wheels, and drills, shall be provided with local exhaust ventilation systems in accordance with subdivision (ii) of this subparagraph.</p> <p>(iii) <i>Spraying, demolition, or removal.</i> Employees engaged in the spraying of asbestos, the removal, or demolition of pipes, structures, or equipment covered or insulated with asbestos, and in the removal or demolition of asbestos insulation or coverings shall be provided with respiratory equipment in accordance with paragraph (d) (2) (iii) of this section and with special clothing in accordance with paragraph (d) (3) of this section.</p> | <p>(8) Hand operated power tool (chipper) used to remove asbestos from cell without local exhaust ventilation.</p> <p>(9) Worker operating power tool (7) without respiratory protection.</p>                                                                                                                                                                  | <p>August 18, 1976</p> <p>July 15, 1976</p>                                         |
| 3.             | <p>(d)(2)(iv)(a); ANSI<br/>Z88.2-1969 (3.5.6)<br/>and 1910.134(b)(6)</p> <p>(iv) <i>Establishment of a respirator program.</i> (a) The employer shall establish a respirator program in accordance with the requirements of the American National Standards Practices for Respiratory Protection, ANSI Z88.2-1969, which is incorporated by reference herein.</p> <p>3.5.6 Respirators shall be stored in a convenient, clean, and sanitary location. See 8.5.</p> <p>(6) Respirators shall be stored in a convenient, clean, and sanitary location</p>                                                                                                                                                                                                                                                                                                                                                            | <p>(10) Replacement and respirators improperly stored in cell renewal area (east wall).</p> <p>(11) Improper storage of Confo-II respirator near lead pots.</p> <p>(12) Single use air purifying respirators not properly protected while not in use (fluffing area and slurry tank area).</p> <p>(13) New respirators stored in tool cabinet unprotected.</p> | <p>July 15, 1976</p> <p>July 15, 1976</p> <p>July 15, 1976</p> <p>July 15, 1976</p> |

July 22, 1976

| ITEM<br>NUMBER | STANDARD REGULATION<br>OR SECTION<br>ALLEGEDLY VIOLATED                                                                                                                                                                                                                                                                                                                                                                                                                                                | DESCRIPTION OF<br>ALLEGED VIOLATION                                                                                         | SUGGESTED DATE<br>FOR CORRECTION<br>OF ALLEGED<br>VIOLATION |
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| 4.             | 1910.134 (b)(7)<br><br>(7) Respirators used routinely shall be inspected during cleaning. Worn or deteriorated parts shall be replaced. Respirators for emergency use such as self-contained devices shall be thoroughly inspected at least once a month and after each use.                                                                                                                                                                                                                           | (14) Respirator (Confo cartridge type) not cleaned and deteriorated on west wall bench cell renewal area.                   | July 15, 1976                                               |
| 5.             | 1910.134 (b)(9)<br><br>(9) There shall be regular inspection and evaluation to determine the continued effectiveness of the program.                                                                                                                                                                                                                                                                                                                                                                   | (15) Excessive number of discarded respirators located at non-designated collection points. Inadequate regular inspections. | July 15, 1976                                               |
| 6.             | 1910.134 (e)(5)<br><br>(5) For safe use of any respirator, it is essential that the user be properly instructed in its selection, use, and maintenance. Both supervisors and workers shall be so instructed by competent persons. Training shall provide the men an opportunity to handle the respirator, have it fitted properly, test its face-piece-to-face seal, wear it in normal air for a long familiarity period, and, finally, to wear it in a test atmosphere.                               | (16) Improper use of Confo-II mask by lead pot operator - (bottom strap not used for proper facial fit).                    | July 15, 1976                                               |
| 7.             | 1910.1001 (d)(2)(iv)(a) and 1910.134 (b)(1)<br><br>(iv) Establishment of a respirator program. (a) The employer shall establish a respirator program in accordance with the requirements of the American National Standards Practices for Respiratory Protection, ANSI Z88.2-1969, which is incorporated by reference herein.<br><br>(b) Requirements for a minimal acceptable program. (1) Written standard operating procedures governing the selection and use of respirators shall be established. | (17) No written respiratory protection program specific to the asbestos cell renewal area available.                        | August 11, 1976                                             |

BB 0000081

July 22, 1976

| ITEM<br>NUMBER          | STANDARD REGULATION<br>OR SECTION<br>ALLEGEDLY VIOLATED                                                                                                                                                                                                                                                                                                                                                                                                                                                | DESCRIPTION OF<br>ALLEGED VIOLATION                                                                                             | SUGGESTED DATE<br>FOR CORRECTION<br>OF ALLEGED<br>VIOLATION |
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| 8. (d)(3)               | (3) Special clothing: The employer shall provide, and require the use of, special clothing, such as coveralls or similar whole body clothing, head coverings, gloves, and foot coverings for any employee exposed to airborne concentrations of asbestos fibers, which exceed the ceiling level prescribed in paragraph (b) of this section.                                                                                                                                                           | (18) Employee using air hose to remove particulates from cell bottom without the use of proper clothing.                        | July 16, 1976                                               |
| 9. 1910.1001 (d)(4)(ii) | (ii) Clothes lockers: The employer shall provide two separate lockers or containers for each employee, so separated or isolated as to prevent contamination of the employee's street clothes from his work clothes.                                                                                                                                                                                                                                                                                    | (19) No provision for clothes lockers or containers for special protective garments - garments were hung randomly in work area. | August 11, 1976                                             |
| 10. 1910.1001 (f)(1)    | (f) Monitoring—(1) Initial determinations. Within 6 months of the publication of this section, every employer shall cause every place of employment where asbestos fibers are released to be monitored in such a way as to determine whether every employee's exposure to asbestos fibers is below the limits prescribed in paragraph (b) of this section. If the limits are exceeded, the employer shall immediately undertake a compliance program in accordance with paragraph (c) of this section. | (20) Initial monitoring to determine every employee's exposure not accomplished within the six months specified.                | Immediate Program                                           |
| 11. (f)(2)(ii)          | (ii) Sampling frequency and patterns. After the initial determinations required by subparagraph (1) of this paragraph, samples shall be of such frequency and pattern as to represent with reasonable accuracy the levels of exposure of employees. In no case shall the sampling be done at intervals greater than 6 months for employees whose exposure to asbestos may reasonably be foreseen to exceed the limits prescribed by paragraph (b) of this section.                                     | (21) Last monitoring data collection January 9, 1976 which exceeds interval greater than six months.                            | Immediate Program                                           |

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July 22, 1976

| ITEM<br>NUMBER                  | STANDARD REGULATION<br>OR SECTION<br>ALLEGEDLY VIOLATED                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | DESCRIPTION OF<br>ALLEGED VIOLATION                                                                                                                      | SUGGESTED DATE<br>FOR CORRECTION<br>OF ALLEGED<br>VIOLATION |
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| 12. (f)(3)(i) and<br>(f)(3)(ii) | <p>(3) <i>Environmental monitoring</i>—(i) samples shall be collected from areas of a work environment which are representative of the airborne concentrations of asbestos fibers which may reach the breathing zone of employees. Samples shall be collected on a membrane filter of 0.8 micrometer porosity mounted in an open-face filter holder. Samples shall be taken for the determination of the 8-hour time-weighted average airborne concentrations and of the ceiling concentrations of asbestos fibers.</p> <p>(ii) <i>Sampling frequency and patterns.</i> After the initial determinations required by subparagraph (1) of this paragraph, samples shall be of such frequency and pattern as to represent with reasonable accuracy the levels of exposure of the employees. In no case shall sampling be at intervals greater than 6 months for employees whose exposures to asbestos not reasonably be foreseen to exceed the exposure limits prescribed in paragraph (b) of this section.</p> | (22) Insufficient environmental monitoring of areas which are representative of airborne concentrations which may reach the breathing zone of employees. | Immediate Program                                           |
| 13. 1910.1001 (g)(1)(i)         | <p>(g) <i>Caution signs and labels.</i> (1) <i>Caution signs.</i> (i) <i>Posting.</i> Caution signs shall be provided and displayed at each location where airborne concentrations of asbestos fibers may be in excess of the exposure limits prescribed in paragraph (b) of this section. Signs shall be posted at such a distance from such a location so that an employee may read the signs and take necessary protective steps before entering the area marked by the signs. Signs shall be posted at all approaches to areas containing excessive concentrations of airborne asbestos fibers.</p>                                                                                                                                                                                                                                                                                                                                                                                                       | (23) Entrances into areas where asbestos is used or stored are not properly posted with signs as required (fluffing, cell renewal and storage areas).    | August 11, 1976                                             |

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July 22, 1976

| ITEM<br>NUMBER | STANDARD REGULATION<br>OR SECTION<br>ALLEGEDLY VIOLATED                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | DESCRIPTION OF<br>ALLEGED VIOLATION                                                                                                                                                          | SUGGESTED DATE<br>FOR CORRECTION<br>OF ALLEGED<br>VIOLATION |
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| 14.            | (g)(1)(ii) and<br>(g)(2)(i)<br><br>(ii) <i>Sign specifications.</i> The warning signs required by subdivision (i) of this subparagraph shall conform to the requirements of 20" x 14" vertical format signs specified in § 1910.145(d)(4), and to this subdivision. The signs shall display the following legend in the lower panel, with letter sizes and styles of a visibility at least equal to that specified in this subdivision.<br><br>(2) <i>Caution labels—(i) Labeling.</i> Caution labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers, except that no label is required where asbestos fibers have been modified by a bonding agent, coating, binder, or other material so that during any reasonably foreseeable use, handling, storage, disposal, processing, or transportation, no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section will be released. | (24) Signs in areas improper legend.<br><br>(25) No label on waste container for asbestos (fluffing area).<br><br>(26) Five fiber drums not labeled as required (rear storage on pallets).   | August 11, 1976<br><br>July 15, 1976<br><br>July 15, 1976   |
| 15.            | (g)(2)(ii)<br><br>(ii) <i>Label specifications.</i> The caution labels required by subdivision (i) of this subparagraph shall be printed in letters of sufficient size and contrast as to be readily visible and legible. The label shall state:<br><br>CAUTION<br>Contains Asbestos Fibers<br>Avoid Creating Dust<br>Breathing Asbestos Dust May Cause<br>Serious Bodily Harm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | (27) Rope storage container not properly labeled as required. (Bridge between K302 and K303).<br><br>(28) Waste receptacle for asbestos not properly labeled (Bridge between K302 and K303). | July 15, 1976<br><br>July 15, 1976                          |
| 16.            | (g)(1)(ii) - See #14.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | (29) Improper signs used to designate asbestos area in cell development area (K304?).                                                                                                        | July 21, 1976                                               |
| 17.            | (g)(2)(i) - See #14.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | (30) Asbestos rope in unmarked and labeled cardboard box near mastic and lead pots.                                                                                                          | July 15, 1976                                               |
|                | (g)(2)(ii) - See #15.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | (31) Three trash cans in cell repair area containing asbestos rope not properly labeled.                                                                                                     | July 15, 1976                                               |

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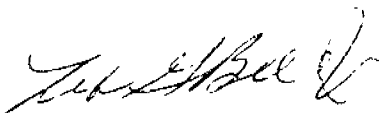
July 22, 1976

| ITEM<br>NUMBER | STANDARD REGULATION<br>OR SECTION<br>ALLEGEDLY VIOLATED                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | DESCRIPTION OF<br>ALLEGED VIOLATION                                                                                                                  | SUGGESTED DATE<br>FOR CORRECTION<br>OF ALLEGED<br>VIOLATION |
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|                | (g)(2)(ii) - Cont'd                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | (32) Cabinet containing asbestos rope in K304 north wall not labeled.                                                                                | July 15, 1976                                               |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | (33) Trash cans in cell renewal area improperly labeled.                                                                                             | July 15, 1976                                               |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | (34) Asbestos rope used as plug for solvent can in cabinet not properly labeled.                                                                     | July 15, 1976                                               |
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | (35) Waste can in cell renewal area damaged so that lid could not be properly positioned, label not legible.                                         | July 16, 1976                                               |
| 19.            | 1910.1001 (h)(1) and<br>1910.22 (a)(1 and 2)<br><br>(h) <i>Housekeeping</i> —(1) <i>Cleaning</i> . All external surfaces in any place of employment shall be maintained free of accumulations of asbestos fibers if, with their dispersion, there would be an excessive concentration.<br><br>(a) <i>Housekeeping</i> . (1) All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition.<br>(2) The floor of every workroom shall be maintained in a clean and, so far as possible, a dry condition. Where wet processes are used, drainage shall be maintained, and false floors, platforms, mats, or other dry standing places should be provided where practicable. | (36) Accumulation of dry asbestos on floor in vacuum pump area under cell renewal area.<br><br>(37) Poor Drainage in fluffing area asbestos storage. | July 16, 1976<br><br>July 15, 1976                          |
| 20.            | 1910.1001 (h)(2)<br><br>(2) <i>Waste disposal</i> . Asbestos waste, scrap, debris, bags, containers, equipment, and asbestos-contaminated clothing, consigned for disposal, which may produce in any reasonably foreseeable use, handling, storage, processing, disposal, or transportation airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section shall be collected and disposed of in sealed impermeable bags, other closed, impermeable containers.                                                                                                                                                                                                                    | (38) Asbestos on floor in cell repair area.<br><br>(39) Asbestos rope found on top of cabinet in cell room east wall.                                | July 15, 1976<br><br>July 15, 1976                          |

BB 0000085 1

July 22, 1976

A review of 1910.1001 paragraph (j) medical surveillance revealed no alleged violations. It is further submitted that many of the above alleged violations could be contested provided there were sufficient monitoring to demonstrate that the permissible exposure limits were not exceeded. The procedures developed by the plant in the event of an OSHA inspector visits Lake Charles went satisfactorily.



Zeb G. Bell, Jr.

/clm

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