From L.L. RIPPEY

PITTSBURGH OFFICE

To DISTRIBUTION

1991 March 13

RE: ALCOA CORPORATE ASBESTOS MANAGEMENT POLICY

The attached Alcoa Asbestos Management Policy has been developed as a subset of Alcoa's Environmental Policy. This policy was jointly written by representatives of Environmental, Industrial Hygiene and Safety, Procurement, Real Estate and Legal. Drafts were twice reviewed by operating locations from some of the U.S. and non-U.S. plants. Input from these sources has been incorporated into the attached policy. All of the locations polled agreed that the attached policy should represent a minimum operating standard for the protection of Alcoa employees and the management of risk. Any location could write their own internal management program to exceed the standard set in this policy.

The basic philosophy expressed in this policy is that when Alcoa controls a facility, asbestos can be managed via remediation and monitoring, but if a facility is sold, the asbestos must be removed to minimize Alcoa's long term liability.

The policy itself doesn't contain an implementation schedule for the development of the written Asbestos Management Program described in item 3. Location representatives reviewing this policy expressed a strong desire to have a negotiated implementation schedule. This concept is modeled after the written plans for corrective action described in the Environmental Policy and would involve an implementation schedule proposed by the plant location and approved by the appropriate Management Committee Member.

Unless there are further recommendations from recipients of this memo, this policy should be considered final as of April 30, 1991 at which time it will be distributed to all of Alcoa's operating locations.

Laura Rippey

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EXHIBIT
AL-1720

ALCOA

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ALCOA CORPORATE ASBESTOS MANAGEMENT POLICY

SCOPE:
Proposed policy will apply to all Alcoa owned or controlled facilities including industrial as well as office buildings. Relevant aspects of the policy also extend to properties leased by Alcoa where Asbestos Management Programs should be required of building owners. Some variations may occur where local regulations or special circumstances dictate.

POLICY OBJECTIVES:
1. Uniform and consistent practices are hereby established for the purchase of facilities, equipment and new products and for the divestiture of equipment and facilities including real estate.

A. Sponsoring managers shall require that environmental surveys conducted prior to purchase of new facilities involve asbestos surveys and risk assessments. Full compliance with all Alcoa asbestos management policies will apply if properties with asbestos are purchased.

B. Procurement agents shall insure that only non-asbestos products are purchased. Every effort will be made to find non-asbestos substitutes for the remaining asbestos containing products used in Alcoa facilities. Deviations from this policy will require written approval of the Location Manager. The Procurement Manager must maintain written records of asbestos products purchased in exception to this policy.

C. Procurement agents shall insure that equipment sold by Alcoa must be free of friable asbestos prior to sale unless an exception is made by Pittsburgh Environmental Control. Where an exception is granted, written disclosure of the presence of asbestos must be provided to the purchaser.

D. Sponsoring managers shall insure that before any sale of real property, an asbestos survey will be conducted. All friable asbestos materials must be removed and disposed of properly. In some cases, non-friable asbestos materials should also be removed if it is suspected that the future use of the property will subject them to damage, thereby releasing asbestos fibers. Exceptions to the removal policy can only be made by Pittsburgh Environmental Control. Buyers must be informed in writing of the presence of any asbestos in buildings which are sold.

2. Operations Managers shall require surveys for all Alcoa facilities to determine the presence of Asbestos Containing Materials, "ACM" (greater than 0.1 % of any fibrous asbestos mineral forms). Surveys must follow the general format recommended in the Alcoa Engineering Standard on Asbestos Surveys and must include the condition of ACM in addition to the location accessibility and an estimate of ACM quantity.

3. Plant managers operating facilities having any ACM shall develop written Asbestos Management Programs which must be approved by a member of Alcoa's management committee. The Location Asbestos Management Program is to include:

A. Identification of ACM via direct labels or any alternatives to direct labeling which would clearly communicate the presence of ACM to affected employees. Such alternatives could include placards, inventories, diagrams, or marked blueprints. To effectively communicate the presence and location of ACM, some of the alternatives should be associated with training and be made accessible to employees.

B. Communication of the presence of asbestos to facility employees and contractors who work in areas where asbestos is present

C. A plan for reinspection of ACM on a periodic basis (minimally, every 3 years) with written inspection reports

D. Remediation, through removal, repair, enclosure or encapsulation of ACM in a deteriorated condition (Attachment 1)

E. Assurance that all asbestos work including removal and disposal is carried out in compliance with all relevant Federal, State and local regulations (ref. Alcoa Engineering Standard 18.18 "Asbestos Removal Standard")

F. Directions to ensure that Operation and Maintenance procedures will be defined to prevent employee exposure to asbestos during normal day- to-day operation of facilities where ACM is present.

G. Acknowledgement that all asbestos contracts will be written in Pittsburgh in close cooperation with the various field Procurement Departments and will be retained for the 30 year retention period in accordance with the 1989 Pittsburgh Procurement policy.

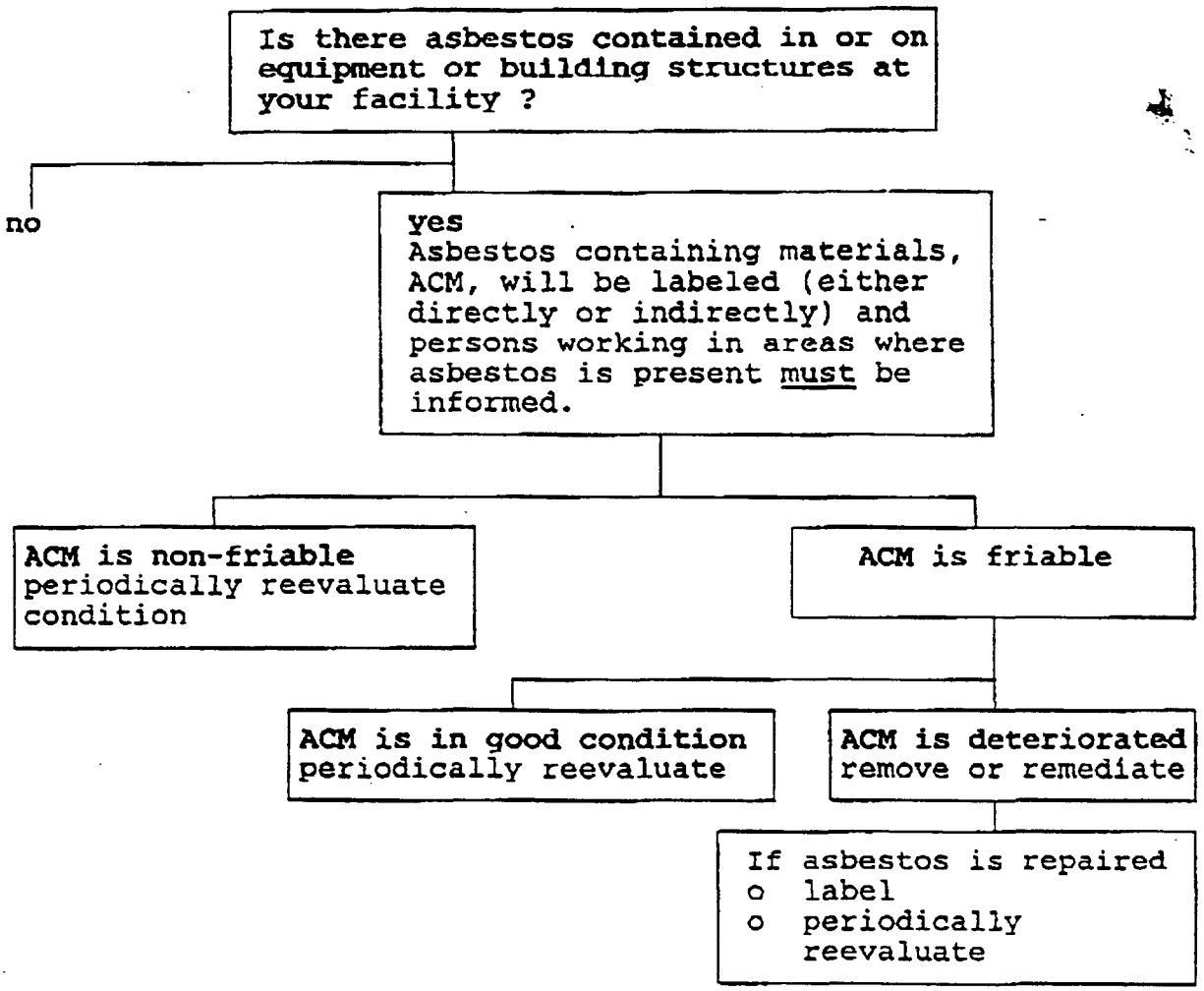
H. A plan to address any potential emergencies where asbestos may be released in the facility. The SPCC (Spill Prevention Control and Countermeasures Plans) could be revised to include this contingency where appropriate.

I. A long range strategic plan that recognizes that at the end of a facilities life, prior to its sale or demolition, all friable asbestos must be removed

4. Alcoa locations will comply with applicable asbestos laws and regulations and will employ more restrictive internal standards where necessary to conform with the above policy.

Attachment 1

MANAGEMENT OF ASBESTOS CONTAINING MATERIALS IN ALCOA FACILITIES



ACM - Asbestos Containing Materials both friable and non-friable materials containing > 0.1% fibrous asbestos mineral forms.

Friable - EPA definition - asbestos containing materials which can be crushed with hand pressure. Examples of friable asbestos include sprayed on fireproofing, most asbestos insulation and any other ACM which is deteriorated to the point that it can be crushed with hand pressure.

Non-friable - Examples asbestos include transite (asbestos cement products) and vinyl asbestos tile.

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