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REF ID: A123

September 12, 1986

Mr. Henry Graham
Louisiana Chemical Association
One American Place, Suite 2040
P.O. Box 1188
Baton Rouge, LA 70821

VISTA

Dear Henry:

Below are my comments on the 8/25/86 draft of the proposed DEQ regulations on certification for asbestos workers. Most of the comments concern the training requirements in 39(c).

1. 89.3(c) allows for "lower level" workers involved in maintenance jobs to receive the required training from a supervisor who has completed the required training from a LDEQ-AQD recognized training institution. However, 89.3(d) appears to require written approval from the State to do this training. The applicability of 89.3(d) to 89.3(c) lower level employee training should be clarified.
2. 89.3(c)(ii) specifically requires 16 hours of training including hands on training. Based on my experience with safety and health training, this 16 hour requirement is unrealistically long. I can see no way the training requirements could take 16 hours. This requirement should be written in performance language such as, "a formal training program shall be done to include the following items:"
3. I'd be interested to know how you train someone to identify asbestos as is required by 39(c)9(ii)(1).
4. 89.3(c)(ii)(7) should be included in 89.3(c)(ii)(5).
5. The course evaluation requirement of 89.3(c)(iii)(3) should be deleted. The purpose of this is not stated and the use of the evaluations is unenforceable.

The majority of training requirements not specific to LDEQ regulations appears consistent with the recently promulgated OSHA asbestos standard.

Please give me a call if you have questions on the above.

Sincerely,


Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

ajo/9

cc M. G. Hayes

VVV 000015470

RECEIVED: 10/1/86
F:

TO: D. A. Kuhn

FROM: T. G. Grumbles

DATE: September 12, 1986

Interoffice
Communication

SUBJ: PROGRESS REPORT FOR THE WEEK ENDING SEPTEMBER 12, 1986

VISTA

1. An Environmental Audit of the Ethylene Plant was completed on September 5.
2. Sent a letter to the State of Louisiana in an attempt to resolve the confusion on letters of credit for hazardous waste financial assurance. Contacted the State of Maryland on the same issue. However, Maryland will not agree to cancel the letter of credit until the State Attorney General's office gives an opinion on the Baltimore Plant's hazardous waste regulatory status.
3. Attended two meetings of CMA's EDC Panel to develop comments on EPA's efforts to regulate air emissions of EDC.
4. Developed comments for the Vinyl Institute on EPA's proposed Toxic Characteristic Leaching Procedure (TCLP).
5. Had discussions with DuPont regarding a draft groundwater assessment order for Baltimore.
6. A survey of the Premiere Polymers Plant was conducted to determine OSHA compliance needs. The plant will need programs for lead, noise, respiratory protection, and hazard communication.
7. A meeting was held with EPA in Dallas to discuss recently promulgated NPDES offshore effluent guidelines. There is a significant problem with muds containing any oil additives passing the required toxicity limitations of the permit.
8. The OKC Industrial Hygiene Audit report was finalized and distributed.

Thomas G. Grumbles

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