

FILE NAME: Todd Shipyards (TODD)

DATE: 1974 TODD009

DOC#: TODD009

DOCUMENT DESCRIPTION: Memo with 2 purchase orders and Asbestos Sampling Report Attached

TODD SHIPYARDS CORPORATION

INTEROFFICE CORRESPONDENCE

FROM: Mr. F. B. McElhill
Contract Administrator
TO: Mr. C. E. Jones
Chief Engineer
RE: OSHA Asbestos

PLANT: Los Angeles Division
PLANT: New York Office
DATE: July 22, 1974

As requested by telephone, I am enclosing the following for your information and use:

- Purchase Order LA-25336 dtd. 11/7/73
- Frederiksen Engineering Co., Inc., ltr. File J-669 dtd. December 5, 1973, w/report
- Purchase Order LA-27790 dtd. 3/22/74

F. B. McElhill
F. B. McElhill

FBM:vg

Enclosures 3

cc w/o encl: J. O'Hara

	INITIAL	DATE
JONES	/	7/22
CLARKE		
CONZALEZ		
HAYES	/	
SIRONEN		

51 0 12 00 34

JUL 24 9 15 AM '74

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION

TO: DIRECTOR, FBI (100-441113) FROM: SAC, NEW YORK (100-111113)

RE: JAMES EARL RAY, AKA; ALIASES; FUGITIVE; C. I. NO. 100-111113

DATE: 7/23/74

FROM: SAC, NEW YORK (100-111113)

SUBJECT: JAMES EARL RAY, AKA; ALIASES; FUGITIVE; C. I. NO. 100-111113

NY 100-111113
NY 100-111113
NY 100-111113
NY 100-111113
NY 100-111113

DATE: 7/23/74

FROM: SAC, NEW YORK (100-111113)

SUBJECT: JAMES EARL RAY, AKA; ALIASES; FUGITIVE; C. I. NO. 100-111113

INVESTIGATION CORRESPONDENCE

SHIPYARDS CORPORATION

(Los Angeles Division)
710 NORTH FRONT STREET (P. O. BOX 231)
SAN PEDRO, CALIFORNIA 90733

TELEPHONE
(213) 832-3361

PURCHASE ORDER

REQ'N. NO.
287079

DATE
11/7/73

VENDOR NO.
3600

LA- 25336

SHIP TO: (COMPLETE ONLY IF DIFFERENT THAN ABOVE)

F.O.B. POINT	
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DELIVERY REQ'D.
AG Require

PRODUCTION DATE

SHIP VIA

PAYMENT TERMS (A)	Net
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DO NOT WRITE IN THESE SPACES

CONTRACT NUMBER

TRANS.	OTHER
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FREDERIKSEN ENGINEERING CO. INC.
6151 West Century Blvd.
Los Angeles, CA 90045

INVOICING AND SHIPPING INSTRUCTIONS - (1) RENDER FOLD COPIES OF INVOICE. (2) SHIPPING MEMO TO ACCOMPANY ALL MATERIAL. (3) ORDER, REQUISITION, PART AND VENDOR NUMBERS MUST APPEAR ON ALL INVOICES, SHIPPING DOCUMENTS, PACKAGES AND CORRESPONDENCE. IMPORTANT TERMS AND CONDITIONS - FURNISH MATERIALS AND/OR SERVICES SUBJECT TO ALL TERMS AND CONDITIONS APPEARING ON THE FACE AND REVERSE SIDE OF THIS ORDER INCLUDING ATTACHMENTS WHICH ARE DEEMED PART OF THIS ORDER.

RESALE PERMIT
NUMBER.☐ IF CHECKED CHARGE
SALES TAX

EXPEDITING POINT

☐ CONFIRMING
ORDER DATED

TO:

☐ TEL. ☐ TWX ☐ LTR

☐ NOT A
CONFIRMATION

DESCRIPTION (Extend through stock code column if not used)

(STOCK CODE)

LINE

QUANTITY

UNIT

PRICE

Services of Industrial Hygienist in accordance with attached specification as per your proposal dated 11-2-73 not to exceed \$10,000.00

\$1,350.00

lost for preparation of sampling gear, travel to and from test location and report preparation will be billed at the hourly rate of \$23 per manhour. (This rate includes normal overhead and field equipment.) Laboratory analysis to determine size and quantity of asbestos particles collected will be \$75 per sample. (Method used assumes all particulate matter collected is asbestos.) Any special laboratory tests requested will be in addition to the quoted not-to-exceed cost and will be billed at \$40 per manhour. Travel and incidental expenses will be billed at cost.

which are based on the assumption that the system is perfect, additional tests are an extra.

75⁰⁰ per day (6.00)
23⁰⁰ per day (2.00)
23⁰⁰ " " (2.00)

JK: CJD

ATTACHMENTS

☐ PARAGRAPH 1 BELOW INAPPLICABLE
IF CHECKED "X".

1. FORM 13-1 ATTACHED HERETO IS INCORPORATED HEREIN.

Specification

TODD SHIPYARDS CORPORATION
BY: *[Signature]*

PURCHASING AGENT

(A) SEE TERMS AND CONDITIONS - ITEM 16
(B) CERTIFIED UNDER DMS REG. 1

**PURCHASE
ORDER**

TODD

SHIPYARDS CORPORATION

(Los Angeles Division)
710 NORTH FRONT STREET (P. O. BOX 231)
SAN PEDRO, CALIFORNIA 90733TELEPHONE
(213) 832-3361

DEPT. NO.

PURCHASE ORDER

SHEET

OF 1

REQ'N. NO.

237083

DATE

3-22-74

VENDOR NO.

3600

LA-2779

SHIP TO: (COMPLETE ONLY IF DIFFERENT THAN ABOVE)

F.O.B. POINT

OUR YARD

DELIVERY METHOD

AS PER

PRODUCTION DATA

SHIP VIA

YOUR DELIVERY

PAYMENT TERMS (A)

NET

DO RATING (B)

CONTRACT NUMBER

COLUMNS

TRANS. OTHER

FREDERIKSEN ENGINEERING CO.

6151 WEST CENTURY BLVD.

LOS ANGELES, CA. 90045

INVOICING AND SHIPPING INSTRUCTIONS - (1) RENDER FOUR COPIES OF INVOICE, (2) SHIPPING MEMO TO ACCOMPANY ALL MATERIAL, (3) ORDER, REQUISITION, PART AND VENDOR NUMBERS MUST APPEAR ON ALL INVOICES, SHIPPING DOCUMENTS, PACKAGES AND CORRESPONDENCE. IMPORTANT TERMS AND CONDITIONS - FURNISH MATERIALS AND/OR SERVICES SUBJECT TO ALL TERMS AND CONDITIONS APPEARING ON THE FACE AND REVERSE SIDE OF THIS ORDER INCLUDING ATTACHMENTS WHICH ARE DEEMED PART OF THIS ORDER.

RESALE PERMIT
NUMBER -☒ IF CHECKED CHARGE
SALES TAX

EXPEDITING POINT

☒ CON-
FIRMING
ORDER DATED

3-21-74

TO: DOANE

☒ TEL.☐ TWX☐ LTR☐ NOT A
CONFIRMATION

DESCRIPTION (Extend through stock code column if not used)

(STOCK CODE)

LINE

QUANTITY

UNIT

PRICE

FURNISH SERVICES OF INDUSTRIAL
HYGIENIST TO ACCOMPLISH SAMPLING AND
FURNISH REPORTS FOR BLDG. NO. 174 -
PATTERN AND JOINER SHOP AND HOUSE AREA
HULL 100 OR 101

1

SEE NOTE 1

NOTES:**1. RATE:**SAMPLING APPROX. 6 EA @ \$75.00 EA
LABOR APPROX. 6 HOURS @ \$23.00 HOUR
REPORTS APPROX. 4 HOURS @ \$23.00 HOUR**2. TECHNICIAN TO COORDINATE WORK WITH
MR. BROMLEY AND/OR MR. MAXWELL.****3. PREDETERMINED PRICE CANNOT BE OBTAINED.
FINAL PRICE TO BE NEGOTIATED.**

RTW/JCW

ATTACHMENTS

☐ PARAGRAPH 1 BELOW INAPPLICABLE
IF CHECKED "X".

RM 13-1 ATTACHED HERETO IS INCORPORATED HEREIN.

TODD SHIPYARDS CORPORATION
BY:

PURCHASING AGENT

(A) SEE TERMS AND CONDITIONS - ITEM 16
(B) CERTIFIED UNDER DMS REG. 1PURCHASE
ORDER

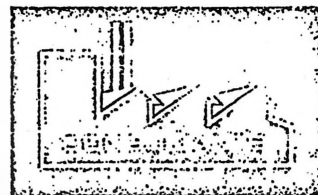
FREDERIKSEN

ENGINEERING CO., INC.

TISHMAN AIRPORT CENTER

6151 WEST CENTURY BLVD. ~ LOS ANGELES, CA 90045

TELEPHONE AREA 213 641-7574



December 5, 1973

File: J-669

Mr. Frank McElhill
Special Assistant to the General Manager
Todd Shipyard Corporation
Los Angeles Division
P.O. Box 231
San Pedro, Ca. 90733

Dear Mr. McElhill:

Enclosed are two copies of the report of the monitoring for airborne asbestos particles at your Los Angeles shipyard. The monitoring was conducted November 14, 1973, by Frederiksen Engineering in accordance with your Purchase Order LA-25336.

Except in the pipe shop, the levels of airborne ~~asbestos~~ particles found in the plant were in violation of the OSHA standards during cutting operations.

We would like to be given the opportunity to propose remedial measures. In addition to our experience in handling particulate material such as asbestos fibers, we have staff personnel available familiar with all types of support equipment that such a particulate removing system may require. Our brochure outlines our capabilities in such areas.

The OSHA regulations require sampling for asbestos at a maximum time interval every six months and I hope that you will keep Frederiksen in mind for such follow-up sampling as may be required.

We appreciate having been given the opportunity to serve you. If we can be of further assistance, please don't hesitate to call.

Very truly yours,

FREDERIKSEN ENGINEERING CO., INC.

James L. Doane
James L. Doane
Staff Engineer

JLD:lf
Encl.



NORTHERN CALIFORNIA AREA



TODD SHIPYARD CORPORATION

LOS ANGELES DIVISION

ASBESTOS FIBER SAMPLING

J - 669 .

Frederiksen Engineering Co., Inc.
Tishman Airport Center 6151 W. Century Blvd.
Los Angeles, Ca. 90045



TODD SHIPYARD CORPORATION

LOS ANGELES DIVISION

ASBESTOS FIBER SAMPLING

Frederiksen Engineering was engaged by Todd Shipyard Corporation to monitor concentrations of airborne asbestos particles at their Los Angeles shipyard. In accordance with Todd Purchase Order LA 25336, monitoring was undertaken to provide data for compliance with the occupational health and safety standards, 29 CFR 1910.93a "Asbestos." Monitoring took place November 14, 1973, in the Joiner Shop (3-samples), the Hull 100 Area (2-samples) and the Pipe Shop (1-sample).

SUMMARY OF RESULTS

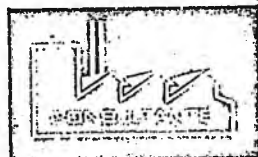
With the exception of the gasket cutting operation, sample results indicate that the concentration of airborne asbestos fibers is in excess of the quantity allowed for ceiling or short-time concentration by OSHA standards. Control of fiber emitted or personnel protection will be required.

Complete results are tabulated at the end of this report.

DISCUSSION OF RESULTS

OSHA standards (29 CFR 1910.93a Asbestos) provide that no employee may be exposed at any time to airborne concentrations of asbestos fibers in excess of

Todd Shipyard Corporation
December 5, 1973
J-669



FREDERIKSEN ENGINEERING

10 fibers, longer than 5 micrometers, per cubic centimeter of air or more than 5 fibers per cubic centimeter on an 8-hour time-weighted average airborne concentration basis.

The sampling method used does not specifically determine the ceiling concentration but does determine a very short time concentration. By sampling immediately before, after and during the generation of airborne particles, an indication of ceiling concentrations is obtained.

Test results indicate that ceiling concentrations were definitely exceeded in the Hull 100 Area and in the Joiner Shop when no control was used. The 8.2 fibers per cubic centimeter measured in the Joiner Shop when using a saw with a vacuum attachment, indicated that the upper limit of 10 fibers was probably exceeded during the period when actually cutting.

The fiber concentration at the asbestos gasket cutting operation was well below both the maximum allowable and 8 hour exposure limits.

The results show that a person witnessing a marinite cut in the Joiner Shop or entering the Hull Area of a ship where marinite has recently been cut probably has exposed himself to a level of asbestos fibers greater than allowed by the standards.

Since the eight-hour time-weighted average is only applicable when the maximum concentration is less than 10 fibers per cubic centimeter, controls or personnel protection must be provided at all areas, except at the gasket cutting machine, regardless of the duration of exposure.

Todd Shipyard Corporation
December 5, 1973
J-669



RECOMMENDATIONS

The OSHA standards are such that there are two ways to meet the compliance regulations. The first is to control the fibers at the source using vacuums, ventilation, and special tools or handling the asbestos fibers wet. The second method is to let the fibers get into the environment and control personnel exposure by respirators, special clothing, change rooms, lockers and medical examinations.

The regulations specify that the exposure limits shall not be achieved by the use of respirators or shift rotation except during the time of installation of engineering controls and in situations where engineering controls are technically infeasible or feasible to an extent that is insufficient to reduce the concentrations below the prescribed limits. The key words are "technically infeasible" which at this juncture have not been well defined.

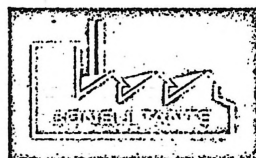
We believe that controlling airborne asbestos in the Joiner Shop by engineering methods is technically feasible; controlling the fibers aboard the ship by engineering methods may be technically feasible. We believe that a combination of engineering and hygienic controls could be developed to satisfy the OSHA requirements aboard ship.

In the interim between now and the time engineering controls are installed, we recommend the following steps:

Joiner Shop

- 1) Limit personnel entering the Joiner Shop to those with approved respirators.

Todd Shipyard Corporation
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FREDERIKSEN ENGINEERING

- 2) Acquire portable ventilation system to exhaust at high volume the air in the cabin where marinite is being installed. Exhaust must be to the outside of the ship away from personnel.

TEST METHOD

All testing was done in accordance with the standards outlined in OSHA Standard 29CFR 1910.93a Paragraph e.

Air from the breathing zone of an employee was drawn at 2.04 liter/minute through a millipore filter during and after the asbestos or marinite cutting operation. After 15 minutes, the air flow was shut off.

The samples were analyzed using phase contrast illumination.

Todd Shipyard Corporation
December 5, 1973
J-669



TODD SHIPYARD ASBESTOS MONITORING

Sample Number	Location/Circumstances of Sample	Number of Fibers Longer Than 5 Microns per Cubic Centimeter	
		Actual Measured	Predicted Time Weighted Average Concentration 1, 2
1.	Joiner Shop-skill saw with vacuum attachment operating	8.2	1.0 ³
2.	Joiner Shop - skill saw	71.8	N.A.
3.	Joiner Shop - panel saw	82.8	N.A.
4.	Hull 100 - cargo officers quarters - various hand tools	22.8	N.A.
5.	Hull 100 - cargo officers quarters - various hand tools twice the number of operations as sample 4	51.9	N.A.
6.	Pipe Shop - gasket cutting machine	0.4	0.2

- (1) Predicted exposure level is based on personnel working in the asbestos or marlinite cutting activities for the time periods stated in Todd letter dated November 15, 1973. Personnel would then not be exposed to work involving the handling of marlinite panels or working where airborne asbestos is present.
- (2) N.A. indicates not applicable due to maximum concentration being exceeded.
- (3) This value may not be applicable since maximum concentration was probably exceeded during period of actual cutting.