

TOM FLORES

ENVIRONMENTAL CONTROL

12-11-74
E. T. B. Bonney - 7 A
MR. A. A. RAMBIKUR

ENVIRONMENTAL CONTROL

cc: *Mr. T. B. Bonney - Pittsburgh*
Mr. Wayne Genter - Point Comfort

February 7, 1974

RE: PHOTOMICROGRAPHS OF ASBESTOS FIBERS IN FLAMEMASTIC FLAME RETARDANT

COPY

Enclosed are four photomicrographs taken of a slide prepared from the membrane filter worn by the painter spraying the flame retardant. As indicated on my December 27 report, the level of asbestos fiber concentration was well below the threshold limit value, nevertheless, some fibers were found as photos 2, 3 and 4 show. However, the majority of the filter is represented by photo 1. Reprints of these photomicrographs have been obtained so that Mr. Tom Bonney and Mr. Wayne Genter may have access to this information.

T. Flores
TOM FLORES

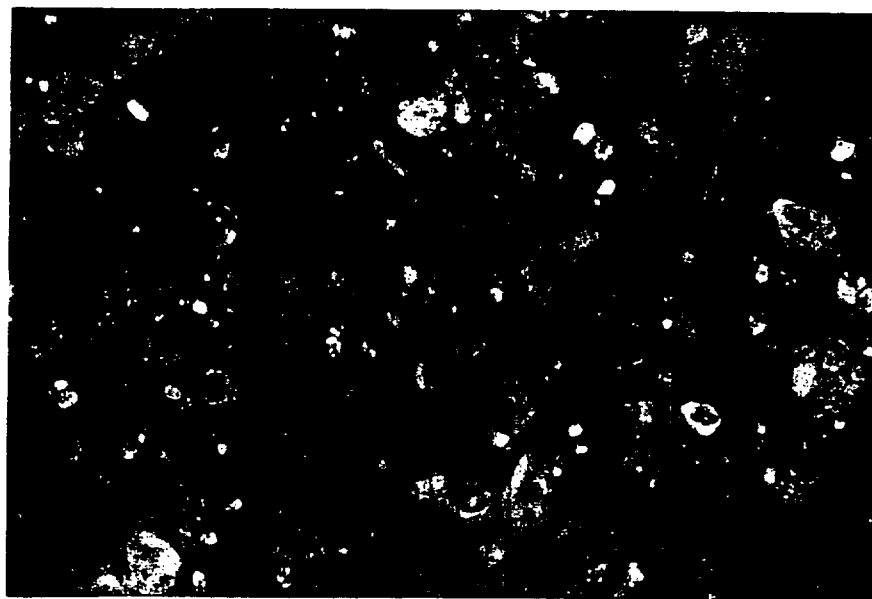
TF:wc

Enclosure

PLAINTIFF'S
EXHIBIT
AL-1127



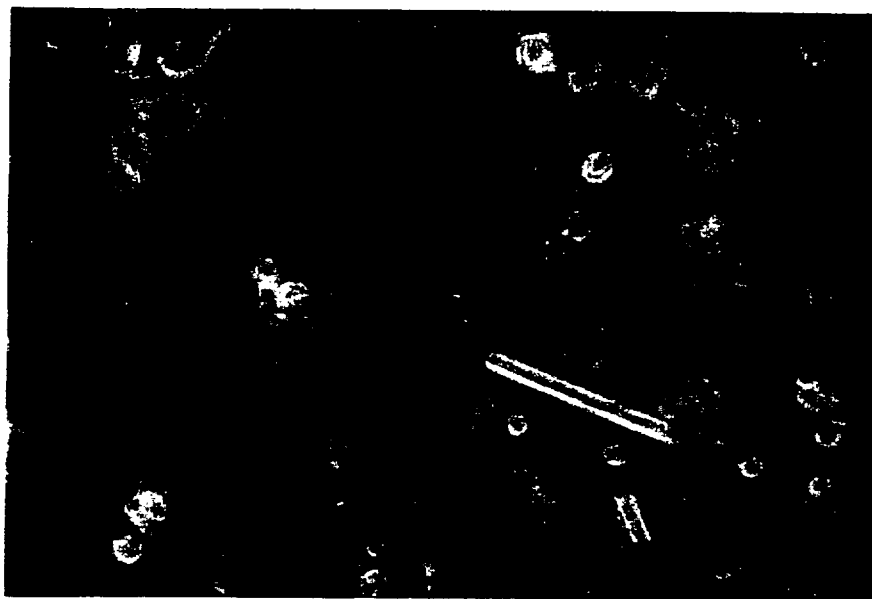
409810 0053



409810 0054

This Photograph
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For Publication in Any Media
Aluminum Co. of America
Point Comfort, Texas

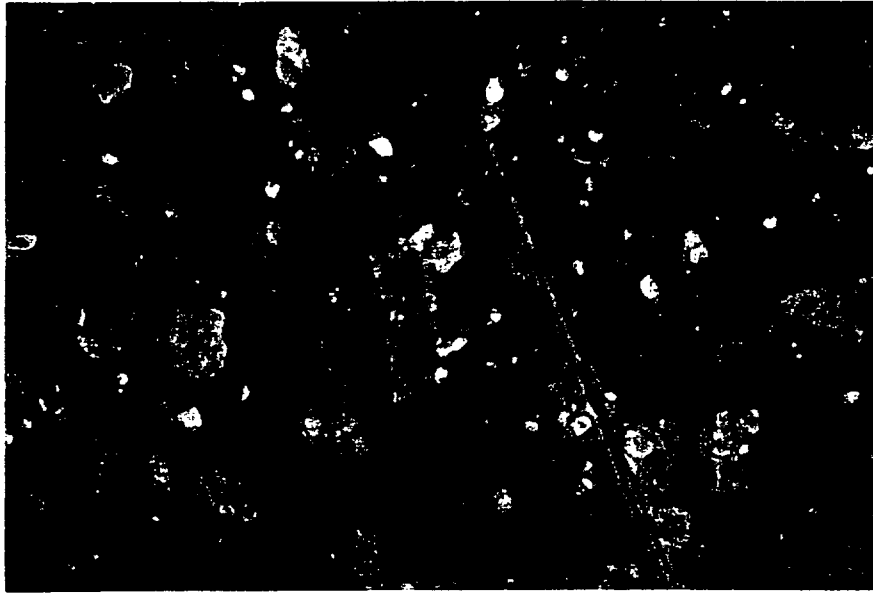
PHOTO No. 2



409810 0056

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Point Comfort, Texas

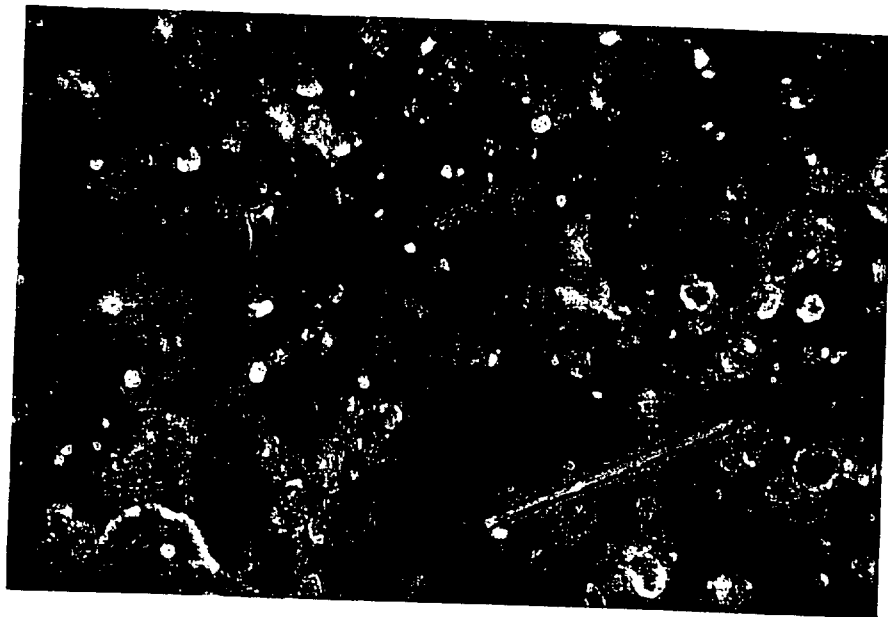
PHOTO NO. 2



409810 0058

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Point Comfort, Texas

PHOTO NO. 3



409810 0060

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Aluminum Co. of America
Fome Oulert, Texas

PHOTO NO. 4

THOMAS B. BONNEY

2/26/74

TO:

Clay,

Thought this might be of interest to you. The fact that Flamemastic's consultants found no fibers during application of the flame retardant made me suspicious of their competency. This is why I felt we had to confirm the facts ourselves. Whereas our pt. Comfort people found the fibers, that almost had to be there, they were present in concentrations that were not of concern.

From the looks of the photos it appears that there is a good bit of other airborne junk around also.



ALCOA

TBM

1501 Alcoa Building
Pittsburgh, Pennsylvania 15219

MR. T. B. BONNEY - 7 AB

FROM C. L. PITTMAN
PITTSBURGH OFFICE - 4 WP

TO MEMORANDUM

Handwritten:
~~Mr.~~
M.
Pgh

January 17, 1974

RE: PRECAUTIONS WHEN SPRAYING FLAMEMASTIC

OSHA requires very special precautions when spraying materials containing asbestos if airborne asbestos exceeds certain prescribed limits. The fire retardant, Flamemastic, which is sometimes sprayed on our electrical cable ladders contains asbestos and raises the question of whether or not special precautions are required.

This matter was referred to Mr. T. B. Bonney and a copy of his reply is attached. Note that he feels that asbestos from the spraying of Flamemastic does not constitute a hazard but he does recommend the interim use of certain respirators.

C. L. PITTMAN

CLP:jss

Attachment

cc: Plant Chief Electrical Engineers
Plant Industrial Hygienists
T. B. Bonney - 7 AB
L. C. Drapela - 3 WP
H. D. Keefer - 4 WP
R. W. Plummer - 20 AB



409810 0063

SF-4563 (REV 11 68)

FROM THOMAS B. BONNEY

TO MR. C. L. PITTMAN

PITTSBURGH OFFICE - 7

PITTSBURGH OFFICE - 4 WPH

January 11, 1974

RE: SPRAY APPLICATION OF FLAMEMASTIC

On the basis of air sampling tests conducted by Analytical Research Laboratories, Inc., and Pt. Comfort personnel, we do not consider it essential that applicators wear air-supplied respirators. Although the OSHA regulation requires the use of a supplied-air respirator when spraying asbestos, the respirator is intended to be used to keep exposures below the permissible exposure limits. Since the airborne asbestos concentrations generated during the application of Flamemastic, even without the benefit of a respirator, are below prescribed limits, we reason that further reduction of asbestos exposure is not required. We have discussed this matter with Mr. Costa of Alcoa's legal staff and he is in agreement with this interpretation.

Pt. Comfort apparently chooses to provide their applicators with supplied-air respirators for their personal comfort because of the odor and the exposures to other components of the flame retardant. There is no reason for them to discontinue this practice. As a matter of fact, we would recommend that applicators wear at least an approved filter respirator such as MSA's Dust-Foe, 3M's 8710 or other similar types. This will afford our employees a degree of comfort and will assure them of protection until we have a better idea of typical exposures during spraying. Additional sampling data will better describe the expected range of contaminant concentrations. Although we are confident of the data we now have, we would prefer some greater depth should we be required to defend our position.

We would appreciate it if Mr. Rambikur would arrange for additional sampling when Flamemastic is scheduled to be applied to the cable trays at Pt. Comfort. A total (dry) weight of material collected on the filter as well as a fiber count should be determined. The total particulate data will determine if exposures other than asbestos are of any concern.

Thomas B. Bonney

TBB:mh

cc: Mr. S. W. Marshall, Pt. Comfort
Mr. A. A. Rambikur, Pt. Comfort
Mr. C. F. Scott, Pt. Comfort



409810 0064

57-4765 (REV 11-68)

FROM TOM FLORES
ENVIRONMENTAL CONTROL

TO MR. A. A. RAMBIKUR
ENVIRONMENTAL CONTROL

cc: Mr. W. Genter/Mr. S.W. Marshall
Mr. C. F. Scott
Mr. C. L. Pittman - Pittsburgh
→ Mr. T. B. Bonney - Pittsburgh

December 27, 1973

RE: ASBESTOS DUST TEST ON FLAMEMASTIC FLAME RETARDANT

Samples were taken at R-45-9Y motor control center while spraying the cable trays with flamemastic flame retardant material. Two samplers were used, one on the man doing the spraying and the other one was placed at the northeast corner of the room with the face of the filter facing the wall. This was to prevent contamination of the filter by a direct hit from the spray gun.

A fine fog was visible in the room while spraying as well as the pungent odor of the vehicle used in the mixture. Both men working in the room wore hoods with purge air.

A noticeable amount of material was collected on the filters, but upon examination under the microscope the asbestos fibers on both filters were well below the required level.

Results below:

Date	Test	Time Sampled	Location	Concentration Fibers/ml	Time Weighted Avg. or Conc.
12-20-73	1	71.17 mins.	On man	.938	.139
	2	57.62 mins.	By wall	.023	.0028

Tom Flores
TOM FLORES

TF:wc

409810 0065

FROM THOMAS B. BONNEY
PITTSBURGH OFFICE - 7

TO MR. C. L. PITTMAN
PITTSBURGH OFFICE - 4 WPH

January 11, 1974

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Thomas B. Bonney

TBB:mh

cc: Mr. S. W. Marshall, Pt. Comfort
Mr. A. A. Rambikur, Pt. Comfort
Mr. C. F. Scott, Pt. Comfort



409810 0066

SP-4502 (REV. 11-69)

MR. T. B. BONNEY - 7 AB

C. L. PITTMAN

MR. W. L. GENTER

PITTSBURGH OFFICE

POINT COMFORT OPERATIONS

November 14, 1973

RE: SPRAY TEST FOR FLAMEMASTIC

You recently inquired as to whether a representative from Pittsburgh would witness the planned spray test for Flamemastic when measurements will be made to determine whether or not asbestos fibers from the Flamemastic would constitute a hazard. Mr. Bonney is overseas; but in referring to his letter of October 11, 1973, on this subject, I gather that he did not plan to send anyone to witness the test since Mr. Rambikur's staff is experienced at these tests. I also discussed this matter with Mr. George Farrah and he said that it was his understanding that no one from the Environmental Health Laboratory at Merwin would witness these tests.

Since no one from the engineering group plans to participate in the tests, you are free to proceed as soon as you have the material and can make the necessary arrangements with Mr. Rambikur.

C. L. PITTMAN

CLP:jss

cc: T. B. Bonney - 7 AB

G. H. Farrah - ATC

S. W. Marshall - Point Comfort Operations

A. A. Rambikur - Point Comfort Operations

fcr: H. D. Keefer



ALCOA

409810 0067