

FROM R. E. PODHORA
INDUSTRIAL HYGIENIST
POINT COMFORT OPERATIONS

TO MR. R. M. ROSE
MANAGER - SAFETY,
ENVIRONMENTAL & HEALTH
POINT COMFORT OPERATIONS

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1978 December 18

RE: ELIMINATION OF UNNECESSARY USE OF ASBESTOS-CONTAINING MATERIALS
ASBESTOS CONTROL PROGRAM - POINT COMFORT OPERATIONS

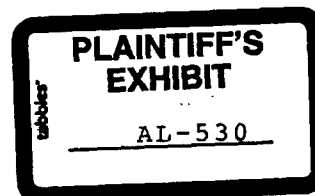
Reference Mr. Tom B. Bonney's letter, 1978 July 28
Mr. R. E. Podhora's response letter, 1978 October 16

In an attempt to eliminate as many asbestos containing materials as possible to minimize employee exposure, the Pittsburgh Industrial Hygiene Department is currently reviewing the plant surveys recently submitted and investigating substitutes. Based on our local experience, I anticipate this monumental task will take several months, at best, to accomplish. Because of the special applications at our chemicals division and, therefore, the uniqueness of Point Comfort Operations and the need to promptly convert to non-asbestos materials wherever practical, I request the temporary, part time assistance from three engineers (one chemical, one mechanical, and one electrical) who are familiar especially with the Electrolyte and Chlor-Alkali plants to assist me in the conversion to non-asbestos materials within the current state of technology. The following are reasons for my request:

1. We must be cautious not to set up substitute materials which are satisfactory for some applications, but could cause a hazardous condition in another area. For example, Fiberfrax is suitable for some Ingot Casting applications, however, it is not resistant to hydrogen fluoride.
2. Considerable work has already been done, however, in order to eliminate a "hit and miss" prolonged project, I believe it would be best for us to apply the necessary manpower to do a thorough job, provide the technical leadership, complete the evaluations in a few months and submit the necessary SF 225 forms for Purchasing and Stores to set up the new stock and eliminate as much asbestos material as possible.
3. Since our engineers are far more familiar with the Point Comfort Chemicals Division's materials applications, we will likely be asked to provide information for the Pittsburgh group anyway.
4. Personal involvement in this project has made me realize that to attempt to do it alone would be overwhelming and poor management.

Rudy E. Podhora
R. E. PODHORA

REP:gm



AP-4983

APC 004936

FROM C. R. WINDBIGLER

TO MR. R. E. PODHORA

June 11, 1975

RE: PROJECTED USE OF ASBESTOES CONTAINING MOLTEN METAL MARINITE

Reference our phone conversation of June 9, 1975 regarding this subject.

The purpose of this letter is to document the effects of the temporary shutdown of the ingot casting facilities with respect to marinite usage.

After the shutdown of the last ingot casting unit (No. 2 HDC) on Sunday, June 1, 1975, all usage of marinite ceased. No marinite is required for the casting of 700 pound pig; therefore, marinite usage will remain zero until sheet ingot casting operations are resumed.



C. R. WINDBIGLER

CRW/gh

cc: Messrs. R. G. Kuerner/F. A. Sharkey
L. E. Gibson/R. M. Rose
C. L. Green/A. A. Rambikur
M. F. Jones, M. D.



SENT BY:

3- 8-96 : 14:27 :

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FROM: R. M. ROSE/RUDY PODHORA
POINT COMFORT OPERATIONS

TO: MANAGERS, SUPERINTENDENTS,
and DEPARTMENT HEADS
POINT COMFORT OPERATIONS

cc: Mr. Bobby Sowders & On-site
Construction Superintendents

1978 July 10

RE: INSULATION REMOVAL AND DISPOSAL

It was brought to our attention 1978 June 28, by members of the insulating department and Bobby Sowders that craftsmen such as pipefitters, mechanical maintenance personnel and others were observed removing insulation from pipes or vessels without the knowledge of the possibility of asbestos in the insulation. The removal of insulation, in most instances, is being done without the proper protective equipment and the craftsmen are using improper disposal procedures for the debris that is generated from this process. Our insulators have been trained to properly handle asbestos materials and, therefore, work under the policy that all insulation contains asbestos until determined otherwise.

In order to maintain compliance with Federal Regulation No. 1910.1001 (asbestos) and to avoid asbestos exposures, the procedures used by the Insulation Department are to be utilized by others who need to remove insulation for one reason or another. These procedures are generalized below:

1. To avoid unexpected and unnecessary asbestos exposure, assume that all insulation contains asbestos.
2. Before demolition or insulation removal is started, all personnel are to be properly protected with NIOSH approved respirators and proper protective clothing, such as disposable coveralls and gloves, head and foot covering.
3. A small sample of the insulation is to be submitted to the Industrial Hygiene Department for microscopic analysis for asbestos. You will be advised whether the insulation contains asbestos or not.
4. If the insulation contains asbestos and whenever conditions and circumstances permit, the insulation should be soaked with water to eliminate or minimize dust generation during demolition.
5. Debris from demolition is to be cleaned up as follows:
 - a. Using the above respiratory protection and protective clothing, all asbestos debris is to be promptly cleaned up and put in plastic bags, sealed, and then deposited in the special asbestos disposal Dempster bucket. It is essential that asbestos debris be promptly cleaned up to minimize the amount of dust that can become airborne by the wind.
 - b. The asbestos is then buried in the solid waste disposal area.
6. Good housekeeping procedures are to be followed

Rudy E. Podhora
R. M. ROSE/R. E. PODHORA
RMR/REP/mg

APC 004938

FROM: R. M. ROSE/RUDY PODHORA
POINT COMFORT OPERATIONS

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and DEPARTMENT HEADS
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R. M. ROSE/R. E. PODHORA
RMR/REP/mg

APC 004939