Mobil Oil Corporation

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PAULSBORO REFINERY
PAULSBORO, NEW JERSEY 08066

February 24, 1981

Mr. Harry D. Allendorf
Area Director
Occupational Safety & Health Admin.
1800 Pavilion Bldg., Room 403
2101 Ferry Avenue
Camden, New Jersey 08104

Dear Mr. Allendorf:

This is in response to your letter of January 19, 1981 regarding a complaint received by your office concerning alleged violations of OSHA regulations at Mobil's Paulsboro, New Jersey Refinery. Your letter stated that the violations complained of were: 1) That employees were not afforded the required access to form OSHA 200, and 2) That employees were exposed to "deteriorating asbestos" in a number of specific areas in the Refinery. To take these complaints in order:

1. OSHA 200 Access:

Mobil has always provided reasonable access to the employees at the Refinery. The forms for all of the years you referred to have been available at various times. I should note also that recently copies of all those forms have been sent to a Union representative who has requested them. Mobil will continue to comply with 29 CFR Section 1910.1001 (f) (1) (2) and (3), although we reserve the right to provide access at reasonable times rather than actual copies as was done in the case referred to above.

2. Deteriorating Asbestos

This complaint raises more complex problems. As you may know, the Paulsboro Refinery has been in existence for over 60 years, and covers an area of over 900 acres. It is comprised of a number of component units which vary greatly in age. As a result, there has been in effect for sometime a continuing program of updating and modernization. One aspect of this program is that insulation is being removed and replaced throughout the refinery on a continuing basis. Much of this insulation is older and thus may contain asbestos; if so, it is, of course, removed in accordance with applicable health

(continued)

PLAINTIFF'S EXHIBIT
MBL-60

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2. Deteriorating Asbestos (cont'd.)

and safety regulations. Generally, there is no way of telling by a cursory visual examination whether or not a given insulation material contains asbestos. It is, therefore, impossible to state with certainty whether all of the specific areas listed in the appendix to your letter contain asbestos. It is possible to say, however, that they are part of the maintenance and replacement program. In general, the older areas are given priority. In one area of the Refinery alone over $100,000 has been earmarked for insulation removal and replacement during a two-year period. Several of the areas listed are in the process of insulation-replacement at the present time.

In addition, monitoring has recently been conducted by our Industrial Hygienist at the most heavily trafficked areas on the list in your letter. Twelve locations were chosen and samples were collected from each of the twelve. In each case, the sampler was placed in the vicinity of the exposed insulation. Samples were collected according to recognized methods and analyzed by an accredited laboratory. The results (a copy of which is attached) were all extremely low, nine of the twelve being so low as to be non-detectable.

It should be noted that the Paulsboro Refinery has recently undergone a "wall to wall" hygiene survey by OSHA, and that no exposure over the permissible level was found. Mobil's results are consistent with OSHA's.

These consistent monitoring results, coupled with Mobil's vigorous program of replacing worn insulation, clearly indicates that there is no cause for concern for the health of refinery employees from exposure to deteriorating asbestos. It also demonstrates that great care is being taken to protect the future.

I trust that this satisfactorily answers the questions raised in your letter.

Very truly yours,

Arthur B. Hiser
Refinery Manager

/rdm
Attachment

bcc: W. J. Selfridge, Jr. - Fairfax
M. S. O'Connor - Valley Forge
A. Benjamini

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MONITORING RESULTS
JANUARY 29-30, 1981

Location	Asbestos Concentrate Fibers/cc(1)
Case and Can Area, Top of Stairs at 1st Operator's Office	<0.01(2)
Between Powerhouses 1 and 3, Under North-South Piperack	<0.01
Powerhouse 3, No. 18 Boiler - North Water Wall Blowdown	0.02
Powerhouse 3, No. 17 Economizer, South Side Overhead Lines	<0.01
Powerhouse 1 - Basement, Southwest Corner at No. 22 Boiler	< 0.01
Tube Still 7 - Under Piping at North End of Exchanger E-9	< 0.01
Tube Still 7 - Northeast Corner of North Furnace	0.04
Furfural II - Under Piperack of Southwest Corner of Control Room	<0.01
Bead Plant - Walking Area Between Dryers 1 and 2, North End	< 0.01
CHD - Under 400 Lb. Steam Line in Piperack at Northwest Corner of Locker Room	< 0.01
CHD - At G-407 Charge Pump, Under Three 90° Sections of Pipe	0.04
Alky - Under North-South Piperack on West Side of Acid Pumphouse	<0.01

(1) For comparison, the OSHA limits for personnel exposure to asbestos are:

8 Hr. TWA - 2 Fibers/cc
Ceiling (measured over 10 Min. Period) - 10 Fibers/cc

(2) "<" means "less than". All such results were non-detectable.

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