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Schedule of Major Problem Corrections

JM Johns-Manville

Internal Correspondence

To: Ramiro Canizo - Mexico City ADM

Date: July 10, 1980

From: W. B. Reitze *WBR* WHQ 1-06

Copies: M. B. Moreno - WHQ 3-14
Paul Kotin, M.D. - WHQ 1-06
Jose Grinda - Mexico City ADM

M. Harris - WHQ 2-13
A. L. Cini - WHQ 3-14

Subject:

I was very happy to have the opportunity to meet with you in Mexico City on July 8, 1980 and discuss the progress being made to correct the ADM environmental problems. As promised, attached is a list of problem areas and a time table for correction of these problems.

This list contains only the major problems that we consider to be of the highest priority. You will note that there is a date for completion of each item. Certain completion dates were taken from your assurances at our recent meeting. If for some reason these dates are not suitable because of back-ordered equipment or delayed construction scheduling, please advise and we can further discuss the dates.

There are a number of items (items 2, 3, 7, 11, 12, 14 and 17) that require immediate action. You will also note that these items do not require the expenditure of large sums of money. They are merely changes in work practices. Each of these changes in work practices should begin with a written ADM policy statement which should be circulated and explained in detail to all levels of supervision. More important than the written document is the day to day enforcement of these work practice changes.

Item 17, "Safety Program at all ADM Locations", is listed in the context of an advisory suggestion. Here, as we discussed, we are interested in correcting the major safety hazards, those hazards that would result in loss of life or loss of limbs to an employee. As discussed, there are a number of locations in all of the ADM plants that have unguarded shafts, pulleys, belts and saw blades. Many of these unguarded areas pose a high risk of an employee getting his clothes caught and thereby being drawn into the moving machinery. The large diameter saw blades (Guadalajara) pose an imminent danger of an operator losing an arm or worse. Throughout the operations there are a number of high platforms where the work procedures should be changed to insure that the guard chains (which for the most part are in place), are used to prevent an employee from stepping off the platform.

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Ramiro Canizo

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July 10, 1980

Your expressed plan to institute many of these changes at Barrientos first and then after the systems are better organized, extend them to the remote locations, is sound. However, in the area of work practices, I believe that all of these locations should be given attention within the next three months.

Your suggestion to furnish me with a status report every two months is excellent, and we will look forward to your reports. In addition to these reports, I will arrange my schedule so that I will be able to visit the plants as well as talk with you at periodic intervals.

Once again, I would like to remind you that we stand ready to help you in any way that we can to accomplish this environmental upgrading of the ADM operations. Please do not hesitate to write or call me by telephone if there are any questions. Our regular meetings during my visits to Mexico City should provide ample time for detailed discussions.

*typed by
S. J. ...*

AREAS NEEDING ATTENTION

1. Fiber feed stations at Barrientos - both pipe machines and sheet machines are to have a positive system for dust control - dry or wet - including bag aside

2. Selling of empty asbestos bags at Barrientos and other plants

3. Use of asbestos containing waste to absorb oil on floor in sheet departments at Barrientos

4. Clean up and rebuilding of silica mill at Barrientos

5. Waste from bag houses at Barrientos

6. Finishing end - Pipe- at Barrientos

ACTION AND DATE OF COMPLETION

- 1st Kollergang to be operating by October 1, 1980
- 2nd Kollergang to be operating by July 1, 1981
- All necessary hooding for fiber feed stations will be reviewed for performance by October 1, 1980
- Changes necessary to correct deficiencies in hooding will be completed by January 1, 1981

- This practice is to cease immediately

- This practice is to cease immediately
- An oiling machine should be installed by April 1, 1981

- Primary crusher to be removed to mine site by October 1, 1980
- Installation of ball mill and dust collector as well as general clean-up of silica plant by January 1, 1981

- Workers hand loading bag house waste (by shovel) for either disposal or refeed must wear respiratory protective devices
- An engineering solution to this problem must be in place by July 1, 1981

- All finishing end machines (lathes, coupling cut-offs, etc.) shall be either converted to wet cutting or hooded and tied into a dry collection system by July 1, 1981. Methods for efficient clean-out of wet collection system shall be installed by January 1, 1981

AREAS NEEDING ATTENTION

ACTION AND DATE OF COMPLETION

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| <p>7. Dust collection system
regrind at <u>Barrientos</u></p> | <p>- The regrind dust collection system should be reviewed with particular attention to a regular maintenance program and a general area clean-up. This should be accomplished by November 1, 1980</p> |
| <p>8. Periodic inspection and maintenance program, all dust collectors -
<u>all plants</u></p> | <p>- Design and institute program which will provide assurance that all existing dust collectors are functioning properly. This should be completed by January 1, 1981</p> |
| <p>9. Comprehensive housekeeping program in <u>all ADM plants</u></p> | <p>- A comprehensive housekeeping program must be designed and implemented in all plants immediately. This shall include <u>prompt</u> (same shift) removal of dust, scrap, spilled raw materials, trash from floor, machinery, and overhead ducts and beams, <u>wet sweeping</u> only is to be used until adequate vacuuming systems can be installed at a later date. Vacuuming (central or boosters from existing collectors) should be designed, installed and functioning by July 1, 1981</p> |
| <p>10. Medical program - large (35 x 43 Cm) x-rays, pulmonary function testing, and complete medical examination including hearing test at <u>all ADM plants</u></p> | <p>- Clinic will be completed at Barrientos, fully staffed and equipped by January 1, 1981
- A mechanism must be devised so that this clinic at Barrientos will service all ADM locations</p> |
| <p>11. "Blue" asbestos fiber feed station at <u>Villa Hermosa</u></p> | <p>- A dust-free blue fiber feed station must be designed and installed at Villa Hermosa by January 1, 1981</p> |
| <p>12. Fluid effluent <u>all locations</u></p> | <p>- Investigations and evaluations should be made of all plants' waste water discharge by July 1, 1981. Any plant not in compliance with Mexican law should begin writing plans to bring fluid effluent into compliance by January 1, 1982. Exception to above time schedule would arise if Mexican government desires earlier action.</p> |

AREAS NEEDING ATTENTION

ACTION AND DATE OF COMPLETION

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| <p>13. A comprehensive respirator program for <u>Barrientos</u> and <u>Guadalajara</u>
A limited respirator program for <u>Villa Hermosa</u> and <u>Hermosillo</u></p> | <ul style="list-style-type: none">- A respirator program designed to provide any employee working in high dust areas with respirator protection. The program must be made mandatory with disciplinary measures taken for infractions. The program must be enforced by the supervisor.- A mandatory respirator program to assure protection of workers at fiber feed stations during actual charging shall be instituted at Villa Hermosa and Hermosillo |
| <p>14. Mexican government employment regulations - <u>all locations</u></p> | <ul style="list-style-type: none">- Effective immediately, all Mexican government regulations dealing with employment of under age workers must be adhered to |
| <p>15. Solid waste disposal - <u>all plants</u></p> | <ul style="list-style-type: none">- Beginning immediately, a program should be implemented to promptly and safely remove asbestos containing waste from buildings and adjacent property. Asbestos containing waste should be covered with other material at disposal site |
| <p>16. Use of sludge for storage yard and roadway surfacing <u>Barrientos</u></p> | <ul style="list-style-type: none">- Surfacing of storage yards and roadways with sludge from settling ponds should cease immediately. Extremely dusty (asbestos containing) roadways should be recovered with a nonhazardous material |
| <p>17. Dust collectors on mixer platforms at <u>Queretaro</u></p> | <ul style="list-style-type: none">- Dust collectors on mixer platforms shall be installed by January 1, 1981 |
| <p>18. Dust collection system and bulk handling system for raw materials at <u>Hermosillo</u></p> | <ul style="list-style-type: none">- A dust collection system and bulk handling system for asbestos, silica and cement will be installed and operating by January 1, 1981 |
| <p>19. Safety program at <u>all ADM locations</u></p> | <ul style="list-style-type: none">- Beginning immediately, a survey of all ADM locations should be made to identify major safety hazards. These major safety hazards should be corrected within three months from date of identification. Major safety hazards would include unguarded saw blades, shafts, pulleys and high platform walkways |



Internal Correspondence

To: M. Llano Asbestos de Mexico Date: November 6, 1980

From: W. B. Reitze WHQ 1-06

Copies:	P. Kotin, M.D.	1-06	R. Canizo	ADM	A. L. Cini	3-14
	H. B. Moreno	3-14	F. Aviles	ADM	H. J. Young	1-06
	J. Grinda	ADM	R. Sustaita	ADM		

Subject: ENVIRONMENTAL CONTROL PROGRESS,
ASBESTOS DE MEXICO, NOVEMBER 4, 1980

Helen Young and I met with Messrs. Fritz Goebel, Jose Grinda, Ramiro Canizo, Francisco Aviles and Ricardo Sustaita. The purpose of our meeting and subsequent plant tour was to determine the progress of the written environmental quality improvement plan.

First of all, a few general comments: It was very apparent that some progress has been made at the Barrientos location. More employees than before are wearing respiratory protective devices. The housekeeping throughout the manufacturing and storage areas has improved greatly. There is much evidence of new work being carried on. Steel work is being erected for installation of the first Kollergang. The concrete weirs for water separation in the new close-up system are being completed. The use of waste asbestos fiber to absorb oil in the corrugated sheet area has been discontinued. There is evidence that the used plastic bags are being bundled and placed in the autoclaves for disposal, and I was told that the practice of selling bags has been discontinued. There is evidence that the floor surrounding the regrind system has been paved, making it easier to clean. The use of sludge for paving of storage yards has been discontinued, and we were presented with evidence that the Board of Directors has approved step-by-step to pave these storage yards with concrete. Several of the rather flagrant safety violations noticed during the June visit have been corrected, that is, unguarded high platforms, etc. Inspection of the new clinic facilities indicated that they will be on line very shortly. H. J. Young will comment in a separate report on the clinic facilities.

In order to more clearly discuss some of these issues, I will use the list of nineteen points that I prepared and included in my July 10 memo to Ramiro Canizo.

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AREAS NEEDING ATTENTION

1. Fiber feed stations at Barrientos - both pipe machines and sheet machines are to have a positive system for dust control - dry or wet - including bag aside.
2. Selling of empty asbestos bags at Barrientos and other plants.
3. Use of asbestos containing waste to absorb oil on floor in sheet departments at Barrientos.
4. Cleanup and rebuilding of silica mill at Barrientos.
5. Waste from baghouses at Barrientos.
6. Finishing end - pipe - Barrientos.

ACTION AND DATE OF COMPLETION

- It appears that the first Kollergang should be operating by early January 1981.
- ADM advised that the second Kollergang might be delayed somewhat but that the delay would not be significant.
- The changes in the hood will be accomplished with the installation of the Kollergangs.
- ADM advised that this practice has ceased and evidence indicated that bags were being placed in the autoclave for destruction.
- Visual inspection indicated that this practice had ceased.
- A soap solution is now being used which not only eliminates environmental problems, but apparently it performs its intended function better than the oil.
- ADM advised that because of problems with the supplier this entire project has been delayed for six months.
- ADM advised that hand loading of baghouse waste materials is no longer permitted and, in at least one area, indicated that chutes had been extended and large plastic bags were used for collection of this material.
- The finishing end machines are at present being converted to wet cutting. Inspection indicated that this conversion was actually in progress.

AREAS NEEDING ATTENTION

ACTION AND DATE OF COMPLETION

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| 7. Dust collection system at regrind at <u>Barrientos</u> | - Inspection indicated that some paving of the floor area around the regrind section had been accomplished. Since the regrind unit had broken down and was being repaired, it could not be evaluated during the inspection. |
| 8. Periodic inspection and maintenance program, all dust collectors - <u>all plants</u> . | - ADM advised this was still being done on a hit and miss basis, but that plans have been made to incorporate this function into the duties of a newly appointed environmental engineer, Mr. Ricardo Sustaita. |
| 9. Comprehensive housekeeping program at <u>all ADM plants</u> . | - Inspection indicated that the existing program had been augmented greatly, although improvements are still needed.
- The overseeing of this function should also be assigned to Mr. Ricardo Sustaita. |
| 10. Medical program - clinic | - This is progressing very well and will be covered by H. J. Young's memo. |
| 11. "Blue" asbestos fiber feed station at <u>Villa Hermosa</u> . | - The "blue" fiber will be fed directly into the Kollergang and ADM advised that they felt the dust collection system on the Kollergang, once balanced, would be sufficient to remove dust. This should be verified when this is fully operational. |
| 12. Fluid effluent - <u>all locations</u> . | - The solution to this problem is progressing very well at Barrientos and, again, with the full training and assignment of Mr. Ricardo Sustaita this should progress satisfactorily. |

AREAS NEEDING ATTENTION

13. A comprehensive respirator program for Barrientos and Guadalajara. Limited respirator programs for Villa Hermosa and Hermosillo.

ACTION AND DATE OF COMPLETION

- While the respirator program at Barrientos has been improved slightly, there is a long way to go. Workers were seen at many locations not wearing respiratory protective devices.
- One flagrant violation that should be corrected immediately is the mandatory requirement that all maintenance workers must wear respiratory protective devices. Inspection indicated that none of the maintenance workers repairing the regrind operation were wearing respiratory protective devices, even though they were handling asbestos fiber and clouds of dust were emanating from the workplace.
- Inspection indicated that workers at the feed stations--chrysotile and blue--were not wearing respiratory protective devices and the air systems were not in operation. ADM advised that the reason the air systems were not in operation was the fact that they were being revamped and would be completely redone when the new Kollergang and collectors were put in place.
- Until the dust collection systems in the new AC pipe plant are separated--that is, material conveying and collection--all operators must wear respiratory protective devices. This is one program that cannot wait. We will be making a special effort to provide Mr. Ricardo Sustaita with aids to train workers on the importance of respirator programs.

14. Mexican government employment regulations - all locations.

Despite previous statements by ADM personnel at various locations, now ADM assures me that no under-age workers are being employed, nor have they been employed in the past. The strict Mexican government regulations are being adhered to and have been adhered to, and any visual impressions gained during previous inspections perhaps were due to small sized men, not young boys.

AREAS NEEDING ATTENTION

ACTION AND DATE OF COMPLETION

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| 15. <u>Solid waste disposal - all plants.</u> | - Although this is being looked into, again ADM hopes that with the assignment of Mr. Ricardo Sustaita on a full-time basis, this can be augmented. |
| 16. Use of sludge for storage yard and roadway surfacing - <u>Barrientos.</u> | - ADM advised that this procedure has been eliminated and, further, showed me fiscal commitments for the year 1981 which would step-by-step pave these yards. |
| 17. Dust collectors on mixer platforms at <u>Queretaro.</u> | - ADM advised that decisions have been made to install a new dust collector when new mixer is installed. The smaller dust collectors now in use on the mixers will then be moved to the injection molding equipment. This operation will be completed as soon as a final decision is reached on the type of large mixer to be installed. |
| 18. Dust collection system and bulk handling system for raw materials at <u>Hermosillo.</u> | - ADM advised that this is being worked on. The money has been appropriated for this system, but it is not too clear to me what the progress will be. |
| 19. <u>Safety program at all ADM locations (advisory only).</u> | - Some of the major safety hazards have been corrected--guarding of platforms, saws at Guadalajara, etc. Again, this function should be augmented when Mr. Ricardo Sustaita becomes fully operational. |

I appreciate the time for some in-depth discussions regarding philosophical differences regarding workplace safety and health. These discussions have helped me to understand why patience must be exercised. I think it is also very important to say that, in spite of this, people at risk must be protected even if this should mean upsetting some traditional thinking. In those situations requiring rather large engineering projects, patience will be necessary. However, in the mandatory wearing of respiratory protective devices, this must be fully implemented immediately in order to protect the health of those working with asbestos fiber.

Generally speaking, I was pleased with the progress that has actually been made and I was also pleased to receive a copy of the 1981 budget indicating the ADM Board of Directors has approved substantial sums for continuation of these projects. I still feel very strongly that all of those in the ADM management must keep a continual pressure to assure that these projects are completed as soon as possible. There are still employees at possible risk from asbestos-related disease, and this risk must be reduced immediately.

In response to your request to have Mr. Ricardo Sustaita trained, I am arranging for this and you will be advised within the next few days regarding this matter.

In answer to your questions as to when I would return for a visit, my plans currently call for a visit in the spring and you will be advised several weeks in advance. At that time, I will probably wish to again visit all the ADM locations.

W. B. Reitze

W. B. Reitze