UC 146-2

PLAINTIFF'S EXHIBIT
UC-886

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS • P. O. BOX K, KING CITY, CALIFORNIA 93930

To (Name) J. A. Riddle
Company Engineering Dept.
Location Niagara Falls

Date January 7, 1972 Ref'd to
Originating Dept. For
Answering letter date REC'D JAN 10 1972 E & C
Subject Noted by
Ans'd by M

Copy to

John:

Attached find copies of reports etc., you requested. I have not received the Bureau of Mines report yet. I will forward it when we receive it.

As I reported, and as you can see, the sampling was done under the best of conditions-bagging SG 100, no wind, etc. Mr. VanSandt's conclusion regarding the palletzer is wrong-we have always shown this area to be comparable to the bagger area.

We are going to air-line respirators for the baggers and some kind of portable air-line unit for the palletizer operator. The latter presents a problem as nothing practicle is available at the present. White hat has one under development.

To confirm our discussion by phone:

1. ✓ We feel a portable vacuum unit is necessary as soon as possible for cleaning floors in the main bldg., shop, etc. This is to be added as item J-under 1.

2. We suggest addition to list of:
   ✓(a) Vacume on Redlers as well as screws.
   ✓(b) Dust collection hood for Jeffrey Mill circuit.
   ✓(c) Improved collection from bins and top screws.
   (d) Better way to clean 244 dust collector.
   (e) Alarm for broken bags-dust collectors.
   (f) Revise or replace present ore feed front-end loader and hopper circuit to stop winnowed dust contamination of the shop area and mill buildings.

As I mentioned, I requested $75,000 on the "72" Budget but do not know the status of this. In assigning priorities to the items as you have listed them, I think that items 1, 7, and (f) above should have immediate action. One (1) and the effect of "f" upon it are items principly concerned with Dept. of Labor Emergency Standards for exposure to asbestos dust which became law upon 12-7-1971 when they were published in the Federal Register.

continued.....

The other items result from the EPA proposed Emission Standards and I would think the immediate pressure here is not as great. In fact, some of the proposals need both interpretation of meaning and generation of information to be able to proceed.

Yours very truly,

F. H. Larrison, Jr.

/clg

Mr. J. F. Emerson

October 15, 1971

Grand Junction

P. W. McDaniel
E. A. Piersall
L. P. Twichell

The King City facility was inspected for airborne asbestos dust by 3 Federal Bureau of Mines inspectors and 2 California Division of Industrial Safety inspectors on 10-5-71. No advance notice was received from either group. The Federal inspectors were Messrs. Walter Bank and Amin Alameddin of the Denver Field Health Group and K. L. High from the Alameda California office. The California men were Messrs. Ed Davis and Walter Van Sandt.

The Federal people arrived at the mill at 3:00 P.M., 10-4-71 and were through at 4:00 P.M., 10-5-71. The State Industrial people were here on 10-5 as observers and to collaberate with the Federal group.

Portable samplers were attached to 5 operators and 1 foreman for the 8 hr. day shift with filters being changed each hour. Eleven area locations were sampled for 1 hr. periods with 3 samples at each location. The State inspectors took 6 area samples.

Mr. Bank, who was in charge of the Federal group, informed me that he did not know who requested that they sample the plant but did not feel that it was a complaint type request. During the consultation following completion of their sampling program, the main discussion centered upon the bagging areas and Mr. Bank pointed out that in his opinion we were not justified in our use of a respirator area around the bagging machines. He cited Title 30 Part 55 Paragraph 55.55D, mandatory, which says "Respirators shall not be substituted for invironmental control measures." He feels that assigning a person to work essentially a full shift wearing a respirator is not a "reasonable period of time" as allowed by the above regulation. His report will include these opinions.

I feel their samples will show the bagging areas high as our monthly samples always have. Citation and enforcement authority in these matters is the responsibility of the California State Division of Industrial Safety and what action they will take after receipt of the Federal report and analysis of samples they took is unknown. I believe that we are going to have to program to clean up these areas.

continued.....

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The sampling was accomplished under the best conditions we have, i.e., we were bagging SG-100 (our least dusty products), and the weather was hot, dry, and no wind. Area cleanup the morning of 10-5 and throughout the day was normal-much better than is the case when we are bagging open material.

Very truly yours,

Floyd H. Larrison Jr./clg

F. H. Larrison, Jr.

/clg

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(MINING)

STATE OF CALIFORNIA—HUMAN RELATIONS AGENCY — RONALD REAGAN, Governor

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF INDUSTRIAL SAFETY
455 GOLDEN GATE AVENUE
SAN FRANCISCO

November 30, 1971

RECEIVED
DEC 8 1971
STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
UCC - DIVISION OF INDUSTRIAL SAFETY
KING CITY, 2550 MARIPOSA STREET, ROOM 4065
FRESNO, CALIFORNIA 93721

Union Carbide
Attention Mr. Larry Larrison, Manager
P. O. Box K
King City, California 93930

Accident Prevention Report

AN ACCIDENT PREVENTION SURVEY OF YOUR mining (pit) asbestos (mill)
Type of operation

LOCATED in King City (Monterey County)

MADE BY SAFETY ENGINEER T. E. Davies - 33 DATE 10-5-71

EXPLAINED TO Roger O. Hopper, Mine Foreman COMPLIANCE DATE 1-20-72

Requirements for the elimination of unsafe conditions are listed below. These unsafe conditions are in violation of lawful orders enforced by the Division of Industrial Safety.

The numbers following the requirements listed refer to sections of the California Administrative Code, Title 8, Title 24 (T24) or Labor Code (LC).

Federal Mine I.D. #4004-00-04-035 — 20 employees

BAGGING AREA

1. As indicated in the attached dust survey report, the compressed air bagging machine operation causes asbestos fiber count readings to be as high as eight (8) times the TLV allowable. In this area are personnel who wear respirators 8 hours a day.

Take the necessary measures to control the dust and fibers through local exhaust ventilation in the bagging operation, or provide air supplied hoods to personnel working in high dust areas, in place of the cartridge type respirators. 4102.

Frank Warren
Senior Safety Engineer
Industrial Section

/ala
"enc"

Safety Orders of the Division of Industrial Safety may be purchased from Office of Procurement, Documents Section, P.O. Box 20191, Sacramento, California 95820

FORM S-264-SF (REV. 8-69) 47882-801 10-70 10M ⓘ OSP

E. Davies ✓

Memorandum

To : L. McCune
DIS - SF

Date: October 21, 1971

Subject: UNION CARBIDE ASBESTOS MILL
KING CITY

RECEIVED
DEC 8 1971
UCC - CALIDRIA
KING CITY, CA.

From : Department of Industrial Relations
W. Van Sandt
DIS - SF

We made an industrial hygiene survey of this plant on October 5, 1971. Air samples were collected on millipore filters for asbestos fiber determination. All counts were made at 430X magnification phase contrast illumination. The slides were prepared by the standard method as outlined by the U. S. Department of Health Service.

LOCATION AND OPERATION	Fibers per 1 ml of Air Greater Than 5 microns in Length
Bagging Department	
a. Left side of the compressed air bagging machine. Bags being filled on right side only.	15.0
b. Right side of compressed air bagging machine. Bags being filled on this side only.	42.5
c. Pallet loading machine. Full bags.	13.2
d. General room sample in bagging department. Taken just inside sliding door.	5.5
Milling and Refining Circuits Area. Floors are wet. Some 50 gallons of water per pound of asbestos ore are used in this area of the mill.	2.0
Press-Drying Circuits. The floors are dry, but the asbestos is wet.	2.2
Control Laboratory.	2.2

NOTE: The TLV for asbestos fibers is 5 fibers per 1 milliliter of air greater than 5 microns in length. This is equivalent to 5,000 fibers per liter of air or 141,500 fibers per cubic foot of air.

As would be expected, the bagging department is above TLV. The vicinity of the compressed air bagging machine is exceptionally high, being around 8 times the TLV in fiber count. This machine appears to be the only dust generator in the bagging area. The operator wears a respirator 8 hours a day. The pallet loader does not appear to generate any dust when full bags of asbestos are handled. Asbestos fibers appear to be carried by air currents over to the vicinity of the pallet loader. The fork lift operator wears a respirator all day.

It appears that if the fiber and dust from the bagging machine were controlled, the complete bagging area would be well within TLV limits for asbestos fiber. If this proved to be the case, respirators would not have to be worn in this area. If local exhaust ventilation on the bagger does not prove practical, the operator should be placed in an air-supplied hood. The air supply to the hood should be filtered and determined to be free of asbestos fibers. Likewise, the fork lift operator should be equipped with some portable type of air-supplied system free of asbestos fibers.

This Division recommends consultants who are specialists in various fields. As a matter of Division policy three or more consultants are to be named; sometimes, three or more consultants are not available.

Frederiksen Engineering Company has had extensive experience in the field of industrial hygiene ventilation. They have installed exhaust ventilation in some asbestos mills. Frederiksen is located at 1755 Broadway in Oakland; telephone number 452-3970.

I do not know of other consultants in the Bay Area with experience in the control of asbestos fiber emissions.

Walter A. Van Sandt
Industrial Hygiene Engineer
Environmental Engineering Unit

/ajs
cc(2) E. Davies
cc F. Warren
K. Nobs
EEU-LA

Station — Rock Fiber

		Filter Press Area			Sample Packaging			Pelletizer Area			Bagging Ch. (Bottling)		South Face Line		North Face Line		Bag Conveyor			
		+5M	Total		+5M	Total	+5M	Total	+5M	Total	+5M	Total	+5M	Total	+5M	Total	+5M	Total		
January	(A)	2	29		1	43	3	45	13	135	18	219	1	24	1	18				
	(b)	2	32		2	35	2	30	32	171	28	223	1	19	1	11				
									— SG-210 —				— 15 MPH Wind —							
February	(A)	3	25		6	47	2	25	6	39	49	158	1	21	3	31				
	(b)	3	45		5	41	2	24	6	47	51	144	3	34	2	25				
									— SG-100 —				— 5 MPH Wind —							
March	(A)	2	52		2	22	3	26	55	122	92	187	2	24	1	22				
	(b)	1	27		2	33	1	24	47	141	84	162	1	30	1	20				
									— RG-110 —				— 15 MPH Wind —							
April (ofer)	(A)	1	21		4	30	2	42	70	144	86	165	3	37	3	39				
	(b)	3	22		3	25	3	35	56	125	80	145	3	33	2	24				
									— SG 210 —											
May	(A)																			
	(b)																			
June	(A)	3	34		2	31	2	26	11	60			3	33	3	31	7	60		
	(b)	4	37		4	36	2	24	10	66			3	26	2	26	5	46		
									(HPP)				— 15 MPH Wind —				— AC 144 —			
July	(A)																			
	(b)																			
August (SV)	(A)	8	54		4	27	2	19	6	44	14	134	3	21	2	30				
	(b)	6	35		4	30	3	13	4	47	15	99	2	29	3	20				
									— Super Vis —				— No Wind —							
Septembe	(A)	5	36		5	38	10	37			35	129	4	26	4	23	19	77		
	(b)	5	38		4	34	9	38			9	66	4	24	4	K	19	91		
													— 5 to 10 MPH Wind —							
Octobe	(A)	3	32		4	24	3	13			25	522	4	34	7	65	2	18		
(T350)	(b)	5	50		3	21	2	22			21	633	3	32	5	46	5	21		
									— T350 —				— 20 & 25 MPH Wind —							
Novembe	(A)	3	25		4	39	11	101	24	88	56	128	1	14	2	22				
	(b)	3	67		1	25	5	51	29	86	69	137	3	30	3	30				
									— SG 210 —				— Slight breeze —							
Decembe	(A)																			
	(b)																			
												Σ	45		49					
												÷	18		18					
												$\bar{x}$	2.5		2.72					

CAL—14

Union Carbide trial exhibit UC-886: F. H. Larrison, Jr. to J. A. Riddle on Dust Control Priorities at the King City Mill...
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