Johns-Manville NOV 7 1980 **Internal Correspondence**

To: [illegible] Asbestos de Mexico Date: November 6, 1980

From: W. B. Reitze WHQ 1-06

Copies:						
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	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	ACTION AND DATE OF COMPLETION
1. [illegible]ations at both pipe [illegible] sheet machines are to have a positive system for dust control - dry or wet - including bag aside.	- 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.
2. Selling of empty asbestos bags at Barrientos and other plants.	- ADM advised that this practice has ceased and evidence indicated that bags were being placed in the autoclave for destruction.
3. Use of asbestos containing waste to absorb oil on floor in sheet departments at Barrientos.	- 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.
4. Cleanup and rebuilding of silica mill at Barrientos.	- ADM advised that because of problems with the supplier this entire project has been delayed for six months.
5. Waste from baghouses at Barrientos.	- 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.
6. Finishing end - pipe - Barrientos.	- The finishing end machines are at present being converted to wet cutting. Inspection indicated that this conversion was actually in progress.

W. B. Reitze on Environmental Control Progress at Asbestos de Mexico (1980)
ACL Doc 24596 · Page 2 of 6
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AREAS NEEDING ATTENTION	ACTION AND DATE OF COMPLETION
7. [illegible]ction system at regrind at Barrientos	- 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 - all plants.	- 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 all ADM plants.	- 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 Villa Hermosa.	- 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 - all locations.	- 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.

CE-100

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[illegible]ensive respirator [illegible]or Barrientos and Guadalajara. Limited respirator programs for Villa Hermosa and Hermosillo.	- 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.

	NEEDING ATTENTION	ACTION AND DATE OF COMPLETION
	...ste disposal - ...s.	- 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 - Barrientos.	- 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 Quaretaro.	- 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 Hermosillo.	- 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.	Safety program at all ADM locations (advisory only).	- 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.

CF-100

[illegible] ing, I was pleased with the progress that has actua[illegible] 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.

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W. B. Reitze on Environmental Control Progress at Asbestos de Mexico (1980)
ACL Doc 24596 · Page 6 of 6
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