



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

SDMS DocID 248138

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

RCRA RECORDS CENTER
FACILITY Aerovox Inc
I.D. NO. MAD06231977
FILE LOC. Admin Record #18
OTHER (R-2)

August 19, 1997 VIA FAX

Colburn T. Cherney, Esq.
Ropes & Gray
One Franklin Square, 1301 K Street, N.W.
Suite 800 East
Washington, D.C. 20005-3333

Aerovox
11.9
248138

Re: Protective Measures for Aerovox Workers

Dear Mr. Cherney:

The attached material ("Recommended Minimum Procedures for Immediate Personal Protection at Aerovox," and a diagram of the Aerovox facility second floor indicating proposed "limited access areas") describes measures this office believes should be implemented immediately to provide additional protection to Aerovox workers working in PCB-contaminated areas of the facility. Although, as you describe, capacitor impregnation tank room employees are supposed to leave their work boots at work, that measure would not prevent PCBs from being tracked around within the facility, nor protect employees' hands from PCB exposure. I understand that Peter Szwaja is on vacation and so is unavailable to review these minimum recommendations. Nevertheless, if implemented now, the procedures can easily be reviewed and discussed further upon Mr. Szwaja's return in a few days. Please call if your clients have questions or comments, and let me know if Aerovox is putting these procedures in place.

You reported last Friday that Aerovox officials had met with employees to inform them of the PCB contamination in the tank impregnation room, and of EPA's investigation. I would appreciate it if your clients could provide a summary of the information communicated to the employees. Also, were all employees addressed, or just those working in PCB contaminated areas? Was the information given in English only, or in Portuguese as well? These details will help EPA understand employee reactions to the contamination and ongoing investigation, and help us gauge the effectiveness of precautions against further exposure.

This will confirm that we have scheduled a meeting at EPA with Aerovox and its consultant for August 27, 1997, at 2 pm. Please come to the 10th floor reception area as before. Thank you.

Sincerely,


Thomas T. Olivier
Senior Enforcement Counsel



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 75% recycled fiber

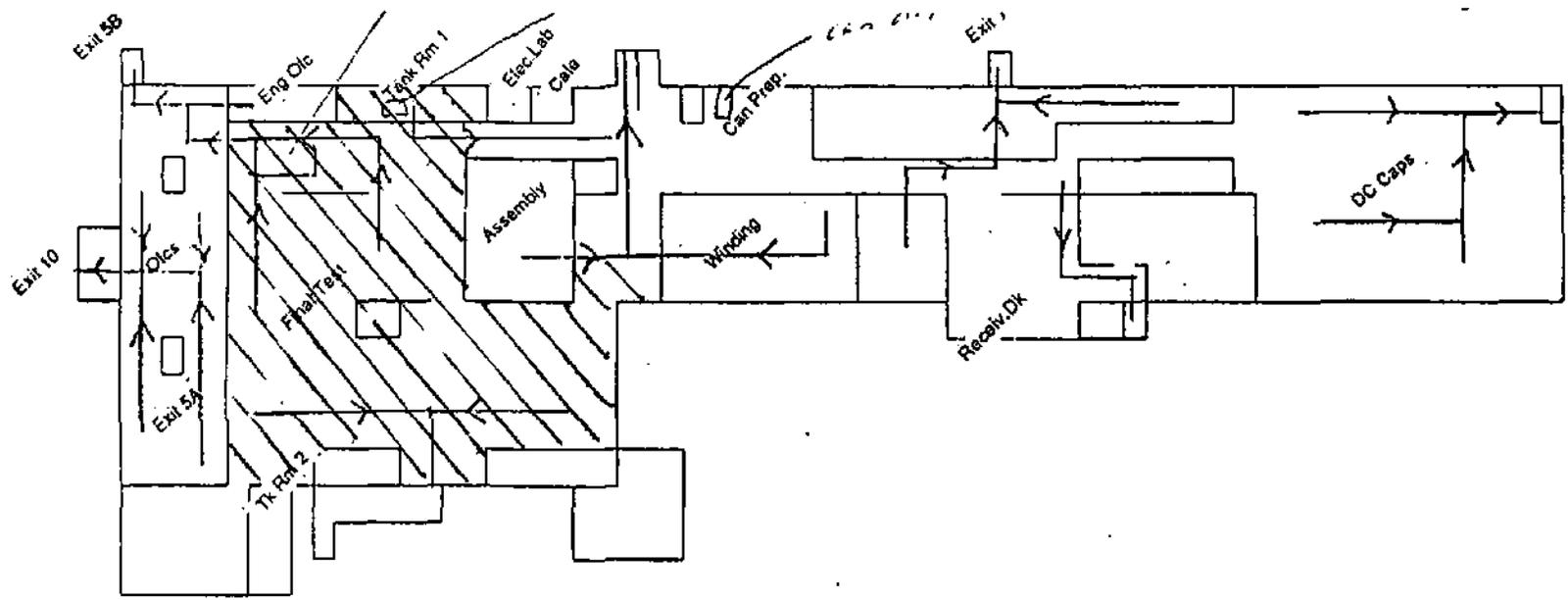
**RECOMMENDED MINIMUM PROCEDURES FOR IMMEDIATE PERSONAL PROTECTION
AT AEROVOX**

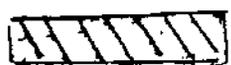
1. Limit access to the impregnation tank room and the adjacent areas. (Refer to the attached diagram of the 2nd floor for location of "limited access areas.") Only personnel necessary to operations within limited access areas should be allowed entry.
2. Personnel in limited access areas should wear protective gloves (i.e., nitrile disposable gloves) and boot covers at all times in those areas.
3. A decontamination area between limited access areas and the other areas of the building should be established.
4. Upon leaving a limited access area and entering the decontamination area, the protective gloves and boot covers should be removed in the decontamination area using standard donning and doffing procedures (i.e., removal of boot covers first, then gloves). Disposable protective equipment must be disposed of as TSCA waste.

If boot covers are not used, any footwear worn inside the limited access areas should be removed and kept in the decontamination area. Other footwear would be worn for other manufacturing areas of the facility.

5. In any other areas outside the limited access areas, in which floors are oil-stained or in which PCBs historically were used, employees should be instructed to change footwear prior to leaving the areas. This would reduce the risk of tracking PCBs to nonmanufacturing areas and to the outside of the facility.

EVACUATION ROUTES SECOND FLOOR



 = limited access areas