

# **Bethlehem Steel Site Profile**

Critical Issues and Questions that need to be addressed truthfully

**June 2006**

## **1. SITE PROFILE & TECHNICAL BASED DOCUMENT**

Bethlehem Steel's Site Profile was not completed before the Technical Based Document (TBD) was approved on March 30, 2003. Please explain.

1.a.) NIOSH was **unaware** of the existence of the 10" (10-inch) Bar Mill building at the time of the TBD approval. Why?

1.b.) Other buildings were involved, including the *Blooming Mill (Reference Wayne Range Letter of June 7, 1976.)*

The purpose of the Blooming Mill was to reduce ingots to billets - (**ingots**) referred to in Government Reports of Bethlehem Steel Company but not acknowledged by NIOSH. Why?

1.c.) **NIOSH overlooked** the 28,000 sq. ft. of unmonitored high Uranium concentration area (sub-basement open under the Cooling Bed). They also **overlooked** the Cooling Bed above. A total area of 56,000 sq. ft. unaccounted for, without any air data at all. Can this be explained?

## **2. SITE WORKER INVOLVEMENT/CLAIMANTS**

NIOSH **never met** with site workers until 16 months after Bethlehem Steel's TBD was approved (July 2004). Why? When at other facilities compensation was withheld until the site profile was completed.

**3.** Four (4) Bethlehem Steel claimants were compensated prior to the TBD approval on March 30, 2003. What was their criteria for compensation?

**4.** Once Bethlehem Steel's TBD was approved, NIOSH began denying claimants without having a completed site profile. Please explain.

5. Four (4) government-owned facility claimants were compensated without a Site Profile, TBD, or Dose Reconstruction prior to Bethlehem Steel's TBD approval. Why should Bethlehem Steel claimants be treated differently?

6. **1949-1950 No records exist at all. How can NIOSH say that “nothing went on” when Bethlehem Steel had contracts to do experimental work?**

AT(30-1) -1279 and AT(30-1)-1156. The technical information resulting from that work was of a classified nature. And the government admits destroying all documentation for that period. NIOSH had no knowledge of what went on in 1949 to 1951. Can this be explained in detail?

## 7. SURROGATE INFORMATION

Surrogate information used by NIOSH was obtained from Simonds Saw, a facility approximately one tenth the size of Bethlehem Steel Company.

7.a.) Not one procedure at Simonds Saw was comparable to Bethlehem Steel's operation – *not even remotely close to allow for a comparison*. Please explain.

7.b.) In 1948 at Simonds Saw, many safety procedures were implemented while working with Uranium, *but those safety procedures were never introduced to the experimental process at Bethlehem Steel from 1949-1952*. Why? Please explain.

7.c.) Personal monitoring took place at Simonds Saw, *but* such personal monitoring was never considered or conducted at Bethlehem Steel. Why?

7.d.) Simonds Saw site profile was *not completed* at the time Bethlehem Steel's TBD was approved, but NIOSH was using data from Simonds Saw to calculate Bethlehem Steel's Dose Reconstruction and deny claims.

## 8. AIR SAMPLE LOCATION & DATA

8.a.) After four years of NIOSH stating the “highest area of contamination was at the Rollers, we find *all the breathing zone samples* (approximately 9) were taken at the Shear Area 500 feet from the Rollers. Please explain.

8.b.) Many of the original documents are undated, illegible or incomplete with no “sample description”. No dates, messy at best. The person that took these samples would not testify for NIOSH - Why? If NIOSH had the proper records why did they need to talk to Dr. Breslin to substantiate the data? Remember this was a Technical Document. The air sample data should have been researched thoroughly prior to the TBD document approval. Explain please.

## 9. GAMMA RAYS

NIOSH states no Gamma rollings took place at Bethlehem Steel. Refer to document **HW -22474** Finished Rollings Done at Bethlehem Steel -“ 4 to 6 12 foot long gamma extruded rods”.

9.a.) If no gamma rollings were done, then why does the “**Elimination Analysis**” refer to “The survey included direct measurement of alpha and beta-gamma radiation levels”?

*January 25, 2005 Findings - Item #8 (Beta and Gamma).*

## 10. ROLLING EXPERIMENTS

“**BBW**” - “**Best Bar Mill in the World**” No other facility in the World was doing continuous Uranium rolling. We were Guinea Pigs.

When doing experimental work you are working with the unknown. The government admits (documented) to destroying these records. Please explain.

## 11. PERSONAL PROTECTIVE EQUIPMENT

No personal protective equipment was issued at Bethlehem Steel such as: Glovebox, Masks, Hoods, Film Badges, etc. How can accurate Dose Reconstruction be modeled without reliable air data or personal monitoring on workers?

## 12. LOST URANIUM

12.a.) Of the approximately 48+ rollings in Bethlehem Steel's TBD only 27.083% of those rollings *are actually documented*.

12.b.) Using NIOSH's figures to calculate the amount of lost Uranium:

Lost Uranium for 48+ rollings at 8 pounds per billet *equals* 13 tons of lost Uranium in 4 years of rollings at Bethlehem Steel.

Amount of "Lost Uranium": *13 tons of radioactive material left on the site according to NIOSH's calculations*. How did NIOSH account for this?

## 13. ROUGH ROLLING

NIOSH states *only* finished rolling took place at Bethlehem Steel. However, the Government documentation verifies that the government purchased *rough rollers* as well as *finish rollers* for Bethlehem Steel. *This error is further evidence of the lack of proper (valid) research by NIOSH.*

## 14. SALT BATH SOAKING TIME REQUIREMENTS & LEAKS

There was a 4-hour loss of time with a salt bath leak.

*Accident: September 22, 1952*

- 303 billets rolled, 9 billets at a time to charge the salt bath
- 23 minutes average time to soak per charge
- 759 minutes total time for soaking time
- 12.5 hours needed for soaking only.

This work cannot be done in a 10-hour working day. It is impossible for this work to be done in a 10-hour working day based on the time requirements.

***Please explain this impossibility. How many other inconsistencies and invalid claims are in these reports?***

#### **15. MANUAL LABOR**

Far exceeds the rolling process at Simond Saw & Steel

- o Sledge hammer rods into shape
- o Moving rods across salt bath with crowbars
- o Removing cobbles
- o Hand held Geiger counters

#### **16. GRINDING LOCATION**

No grinding was recognized or incorporated in BSC's TBD until long after claimants were denied. *This is a critical error* and needs to be explained.

## **17. SKETCH FOR BETHLEHEM'S ROLLING PROCESS**

Submitted into record was a sketch as a description of a 10" rolling mill. This sketch was of a completely different rolling process. **Explain why the wrong sketch was used.** On January 25, 2005 at the California meeting during SC&A's presentation, no one challenged the content of the sketch where a sheet metal mill was displayed not a rolling mill. Also, it is very evident that the 56,000 sq. ft. Cooling Bed area was not depicted and went unnoticed by all.

## **18. NO CONTAMINATION WHEN ROLLERS STOP**

Finding dated January 25, 2005 - Explain observation #3.

The statement by NIOSH asserts that when the rollers stopped: "The generation of airborne activity would cease." *That observation #3 is invalid. NIOSH ignored or refused to address the lack of invalidity of Observation #3. Explain the basis for that conclusion.*

NIOSH sent a document of 40 pages, 7 pages were missing. They never resolved this specific issue.

## **19. BETHLEHEM STEEL COMPANY: A STATE-OF -THE-ART FACILITY**

During 1949 - 1952 Bethlehem Steel Company was a state-of-the-art facility with no comparable facilities Worldwide. There are no other facilities comparable for comparison worldwide. Please explain where NIOSH data was obtained.

June 26, 2006

NIOSH National Institute for Occupational Safety and Health  
Robert A. Taft Laboratories  
4676 Columbia Parkway  
Cincinnati, Ohio 45226-1998

**Issue #14 “Salt Bath Soaking Time”**  
**Incident: Monday, September 22, 1952**

The air sample data that I requested from ORAU, shows any air data for Monday, September 22, 1952.

On September 22, 1952 our TBD shows that 302 billets were rolled. The prior rolling was a week earlier on September 14, 1952 when 303 billets were rolled. These were not on consecutive days as the NIOSH Rep. Stated at the June 21, 2006 meeting.

Our point being as follows:

302 billets were heated in the Salt Bath (divided by 9)  
9 billets were heated at a time (equals 33.6 heats)  
x 23 minutes average heat time per heat  
equals 771.8 total minutes required for heating only (divided by 60 minutes per hour) equals 12.86 Total hours for heating only

NIOSH allows workers a 10 hr. work day. Note that our approximate 13 hr. work day heating time does not allow for any down time such as cobbles, or the loading and unloading of the Uranium bars in the Salt Bath. Men moved these 1200 degree bars across this bath by hand with steel bars and no protection and no breathing zone samples were ever taken.

We presented this information at our June 21, 2006 meeting. NIOSH challenged my figures stating they were incorrect. Could NIOSH explain why my math is incorrect?

There are numerous inconsistencies in this program of which I am prepared to discuss with NIOSH. We feel that this is one of the vast amounts of incidents that represent how this faulty information was incorporated into

our dose reconstruction model time and time again, which certainly makes dose reconstruction inaccurate.

We are only looking for fair and just treatment in this program.

Sincerely,

Edwin Walker  
Bethlehem Steel Action Group