Dear Mr. Elliott,

The Department of Labor in 2001 reported that anyone that had cancer and worked at Bethlehem Steel between 1949 and 1952 was eligible for compensation. In 2002, approximately 10 months later, we were informed the next step is dose reconstruction and then sent out generic questionnaires which would clearly qualify Bethlehem Steel Company claimants in many of the DOE sites in the country. In March of 2003, our TBD was approved by NIOSH without the site profile being completed. Sixteen months later, they finally contacted the site experts for expert worker input. Two months after that, when we requested the Simonds Saw site profile, (being that that information we were told formed the bases for the B.S.C. TBD) we were also told by ORAU that Simonds Saw profile was not completed at that time. When we requested the air sample data, we received incomplete sample data from ORAU. In many other facilities where there were not enough records available to construct a dose reconstruction, NIOSH simply classifies them as a Special Exposure Cohort. At Bethlehem Steel, NIOSH decided to go to Simond Saw for surrogate information. At the time our TBD was approved by NIOSH, no other facility had a completed TBD or a site profile and dose reconstruction. "Bethlehem Steel" - Guinea pigs again, as in 1949 through 1952. As we were told this dose reconstruction is a pilot program for many other facilities in the United States.

In 1949 our government deceived our employees and other facilities by secretly working with hazardous materials with utter disregard for the safety of their lives. Now, 56 years later, we are being treated with the same attitude. Mr. Elliott, if you recall our first worker input meeting was at the request of B.S.C. claimants, to give our insight on what we experienced working there. Our group set up the location and time for the meeting. Two hours, 2 p.m. to 4 p.m. was agreed to. NIOSH gave their Power Point presentation on dose reconstruction and at approximately 3:45 p.m. we had to interrupt your presentation so we would have time to give some worker input. This was 14 months after the TBD was approved by NIOSH. We had approximately 1 hour worker input time. Is this one of the numerous opportunities that you are referring to in your response? I would like to note that the claimants and survivors did share the cost of this meeting hall. We were told to send in the invoice. We did, and never got compensated. What type of government agency would treat these claimants with such malice and try to take credit for a worker input meeting?

This meeting led to the next worker input meeting in Hamburg, NY on July 1, 2004 approximately 16 months after our TBD was approved. The meeting lasted approximately 3 hours. At this meeting we were told that the TBD had taken most all of our information into consideration. The SC&A representative that attended this meeting took notes and throughout the meeting repeatedly stopped our claimants and asked them to repeat different statements. He was the only one to show any real concern for the claimants. We had approximately 20 expert site workers present which allowed each worker at best, 3 minutes.

The next meeting with the workers took place in Buffalo, NY on January 12, 2005. Again, a 2 hour workshop meeting. At this meeting we had a plant superintendent
who worked there during the 1949-1952 Uranium period. He was a Superintendent of the 10" Bar Mill at the time of the Uranium rollings. I was sitting next to a NIOSH executive, when this man was giving testimony. The NIOSH executive asked me for the Superintendents name and telephone number because he stated that, "That man has a wealth of knowledge, and he (the executive) would like to make arrangement to speak with him." I have not heard another word from the NIOSH
executive to this day (another worker input meeting).

In May 25-26, 2004 I received an invitation to attend a dose reconstruction workshop in Cincinnati. I felt a better understanding of dose reconstruction would be of benefit when working with NIOSH. I called to make arrangements to attend and was asked "who did I get this information from?" At that time, I was told that they had no room left. All reservations were full, but they were sorry. Early the next morning, I received a call saying that 2 or 3 people had canceled and I would be able to attend. When I arrived at the meeting there were approximately 20 empty chairs. Does this reflect the attitude of our government 56 years ago? Not much concern for the workers.

If NIOSH would review the picture I sent them of the compete 10" Bar Mill, it plainly shows that it would be impossible to decontaminate it in one day. If dust or large particles were on the rafters without ventilation it could have stayed up there for days until an overhead door would open and blow it off the rafters, and it certainly didn't come down in layers. Monday's dust, Tuesday's dust etc. certainly didn't come down in percentages.

Regarding the air samples (36) taken at Simond Saw in 1948. Does anyone really know what type of ventilation was in place at that time and why did Bethlehem Steel Company not have this health hazard corrected for four years? Documents show that the water cooled bearings of the high speed roller washed off the protective coating, but this would be corrected at Fernald. The dragging of the rods 35 ft. is far exceeded by pushing, rolling and dragging the Uranium rods across the 28,000 sq. ft. metal Cooling Bed. Do you really think that that didn't knock off your protective coating? Look at the attached photo. Note the amount of rods on that bed. What measures were taken to prevent extensive oxide from accumulating in the vicinity of the Cooling Bed? None at B.S.C.

Mr. Elliott as you well know NIOSH has continually stood fast that the highest level of contamination is at the Rollers. It is my understanding the new theory is the highest point of contamination has moved to the Shear area. How would this be known if there weren't any BZ samples at the rollers?

As for the Cooling Bed, NIOSH, after 4 years had no knowledge of it's location, purpose or even of it's existence. This was evident when I was requested to describe and send them a sketch defining it. This bed was 28,000 sq. ft. , 56,000 including the bed above located in the middle of the 10" Bar Mill. This can be seen in the photo I submitted to NIOSH showing the whole Uranium facility. The photos also show a worker grinding operation which was performed on billets before and after rolling. I am not aware if NIOSH ever released these photos or not.

Again in 2005, I received an updated air sample data survey. None of the information showed a B.Z. sample taken in the Salt Bath area. Also the adding of additional rollings, 35 undocumented do not in any way represent what actually occurred during these experimental procedures. Experiment (any action or process undertaken to discover something not yet known, any action or process designed to find out whether something is effective or valid). This was the known process performed at B.S.C. For NIOSH to assume what transpired during those 35 undocumented rollings is not realistic. As shown at (1) documented rolling, the first 30 billets rolled did not have a temperature reading because of faulty gauges. What temp did these rods have 1200, 1800 or 2100 degrees and no air data survey? What percentage of exposure were these unprotected workers exposed to? You can certainly get figures out of a book, but there not indicative of the state-of-the-art experimental facility. 75% of the rollings at B.S.C. have no documentation at all. Again NIOSH takes the benefit of the doubt.

To this day, NIOSH argues that cobbles could not have been cut with an open flame torch because of the Parofic properties of Uranium but 1/25/2005 findings #2 refers to the direct heating applied to the billets at Simond Saw produced excessive levels of airborne contamination, so the direct flame as Simond Saw shows that open flame could be applied directly to Uranium. As the expert workers stated, the cobbles could easily been burned out with a torch, with much higher exposure to the unprotected worker. No B.Z. or G.A. samples were ever taken in this area. The NIOSH document states that these were some of the highest air samples measured at Simond Saw.

Jan. 25, 2005 finding #3 NIOSH document states "Off-Normal Occurrences, such as cobbles or salt bath leaks, resulted in the shut down of the rolling mill process". During these shutdown periods, the generation of airborne activity would cease. " What kind of rationale is this? The boiling salt bath and the 1200 degree rods on the 28,000 sq.ft. Cooling Bed, and the Shearing procedure would continue to operate. Also, if you stopped the rollers, what would be the need to clean up if all the airborne activity would stop?

Jan. 25, 2005 Finding #2 states that according to the workers only Finishing work was processed at Bethlehem Steel Company. You state that the Simond Saw roughing proce4ss was more likely to generate higher levels of contamination, but no document was ever brought forward to verify this. Obviously, that's why you say "more likely." Is there any documentation showing exactly what ventilation was in place at Simond Saw in 1948? There is government documents that were sent to me by NIOSH, 40 page document (plus or minus). Page 4 or 23 that states "it was proposed that new rolls with

the passes to be used by National Lead to be purchased for the roughing and finishing mills at Bethlehem Steel. These were requested for Sept. 1." (Office Memorandum) "United States Government." I believe this is proof that there was roughing at Bethlehem.

The original TBD for B.S.C. did not include Ingestion in the 03/30/2003 version. Even the document of 5/13/1949 HW 19066 "Health Problems Associated with the investigation of off plant Uranium Rolling. Pg. 8 "From observation it seemed that a possible significant factor should be observed in appraising the worker's Uranium intake and excretion values was the ingestion of metal." With the resources, personnel, money, and time of an issue so important could be overlooked, what else can be missing from our TBD?

The (Wayne Ridge Letter of June 9, 1976) the Government states "our procedures for the retention of records have resulted in the removal and destruction of files not specifically identified for historic purpose." The Bethlehem Steel contract began in 1949.

The following reports including the Wayne Ridge Letter refer to the cleanup of the
facility.

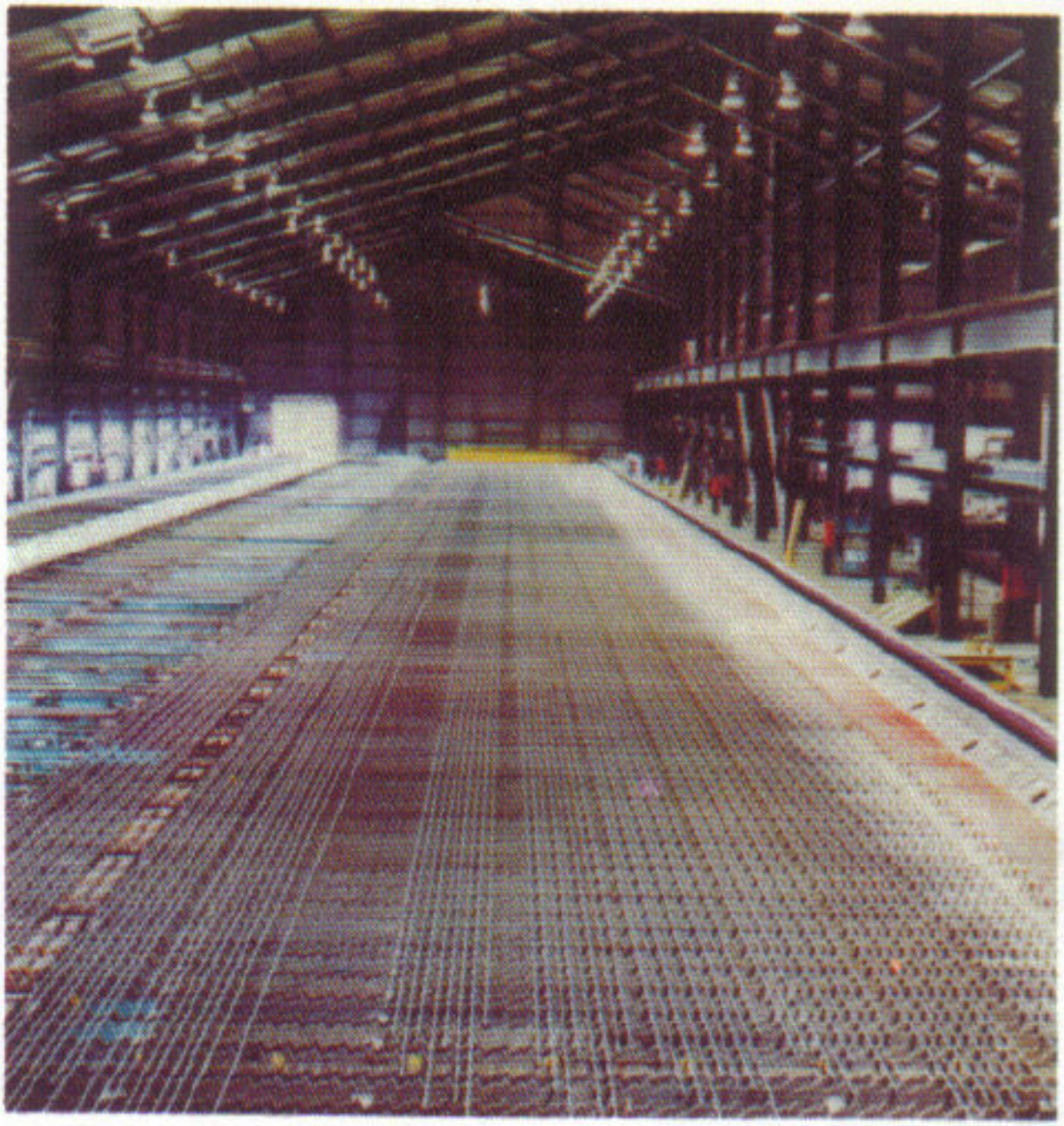
- Preliminary Survey of Bethlehem Steel March 1980
- Elimination Report (No Date) For Bethlehem Steel Lackawanna, N.Y.
- A Radiological Screening Survey August 1976

There isn't one document with a signature on it. Who is accountable for their contents?

Our observations support the allegation that the Bethlehem Steel Company data is missing or was destroyed, fraudulently represents dose and is corroborated by testimony from Bethlehem Steel Company site experts.

There is double standard by which Bethlehem Steel claimants are being judged!!

Ed Walker
Bethlehem Steel Action Group



Bars cool slowly as they are "walked" the 77 ft across 420-ft-long *cooling bed.*