PLAINTIFF'S EXHIBIT

CEL-1430

CELANESE CHEMICAL COMPANY
BAY CITY PLANT

TO: AS LISTED

FROM: C. J. DUEY CJD-132-73 MARCH 2, 1973

SUBJECT: OSHA VISIT AT BAY CITY PLANT

On January 23 and 24, 1973, an OSHA Inspector and an OSHA Industrial Hygienist came to make measurements at the Bay City Plant. The visit was the result of an employee's complaint to OSHA. The employee said that he was exposed to excessive copper chromite dust and filter aid dust while working in the Hydrogenolysis Unit catalyst handling area. He also said that he was exposed to NO_2 blowing into his work area from the Adipic Acid and Nitric Acid Units. The OSHA team limited their measurements to the specific items of the complaint.

Dust Measurements

A MSA Gravimetric Dust Sampler was used by OSHA for measuring the dust breathed by an employee. The equipment consists of a cyclone, a filter, and a rechargeable battery operated pump. The cyclone and dust filter are attached to the employee's collar and the pump is attached to his belt loop. Incoming air passes through the cyclone which removes non-respirable dust (>10 microns diameter). The filter traps the respirable dust. Both respirable and non-respirable dust can be determined by weight. The OSHA Hygienist said he was sending the filters to an HEW Laboratory to determine copper and chrome content.

At least one of the OSHA team stayed with the employee at all times to make sure that he did not deliverately get dust in the filter. The pump flow was frequently re-adjusted to keep it at the calibrated flow (1.7 l/min). The pump will operate for eight hours from one battery charge.

The Bay City Laboratory has since purchased a MSA Dust Sampling kit so that we can get measurements comparable to OSHA.

Vapor Sampling

The OSHA Hygienist used MSA vapor detection tubes for NO_2 measurements. He said that the Japanese (Kitagawa) and German (Drager) tubes were also acceptable. Samples were taken in the working area of the employee. No NO_2 was detected there. The OSHA inspectors asked to go to the Adipic and Nitric Acid Units so they could take samples for NO_2 close to any possible sources.

Their sampling procedure was to go with the outside operator on his normal sample catching round. Air samples were taken near each pump where the operator stopped to catch his samples. The air samples were always taken near the spot where the operator would be breathing. All the samples taken showed that we were in compliance for NO_2 vapors.

Sidelights

The OSHA team was very professional in their measurements and other aspects of their business. They seemed favorably impressed that we had a written document showing our dust measurements in this area. Possibly, this influenced them not to make a more extensive inspection of the area.

It is worth mentioning that the employee's complaint apparently occurred shortly after the Laboratory sampled this area for dust. A little special handling might prevent a complaint from an embittered employee or a hypochondriac. I would recommend that care be taken not to alarm an employee when measurements are taken to check forcompliance with OSHA regulations. It should be explained to him what is being measured and that the measurements are being made to see if we have a problem. He should be told the results of the tests as soon as they are available.

C. J. Duey

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