PLAINTIFF'S EXHIBIT

TEX-133

Texaco

SAFETY & INDUSTRIAL HYGIENE
NOV 19 1984

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DATE: November 7, 1984

TO: Mr. C. R. Ferguson
Anacortes, WA

FROM: Mr. R. A. Cox
Houston, TX

SUBJECT: SAF - INDUSTRIAL HYGIENE
PUGET SOUND PLANT
PROGRAM EVALUATION

Please refer to our May 29, 1984 memorandum to Refinery Plant Managers, and the attached recommendations which concern the industrial hygiene program evaluation conducted at Puget Sound Plant the second week in October. The review was conducted by Mr. D. J. Slack, Texaco USA - Manufacturing and Mr. J. D. Watts, RESD - Safety and Industrial Hygiene Group.

We appreciate the assistance of your staff, especially Messrs. J. D. Drummond and W. A. Rosenberg, in preparing for this effort and providing valuable input for improvement needs. We would also like to acknowledge the assistance provided by RESD in performing these reviews.

Improvement needs are provided below for your consideration. These needs have been listed in order of priority.

- Develop and implement a program to control contractor safety performance (refer to our October 1, 1984 memorandum concerning this subject). The input of health and safety into the various processes of selection, evaluation, and control of contractors is critical to the success of this effort.

- Complete the development of a hazard communication program which will satisfy the recently promulgated State and Federal requirements. (The written instruction and materials inventory should be completed by November.)

- Revise the hearing conservation program so that it is consistent with regulatory requirements and the Company guideline.

- Establish objectives for industrial hygiene sampling (please refer to my July 26, 1984 memorandum concerning exposure monitoring needs and priorities).

- Proceed with the development of a program mandating medical surveillance for certain tasks as outlined in our October 1, 1984 memorandum concerning this subject.

- Improve employe training by including foremen and supervisory personnel in ongoing periodic health and safety training programs which are required by certain regulations (i.e. respiratory protection use, hearing conservation, asbestos handling). In addition, it is our observation that health and safety training may be strengthened by providing greater direction and involvement from plant health and safety staff in stand-up safety meetings.

- Revise the plant instruction concerning respirator use so that it will be consistent with present practice.

- Review plant procedures to verify that shutters or similar controls on ionizing radiation sources will be used prior to any maintenance activity which could place employes in the source path.

Specific recommendations concerning these program needs are provided in the attached computer printouts and were discussed during the survey. These recommendations will be included in the quarterly follow-up of industrial hygiene recommendations.

Since Puget Sound Plant has developed a staff with more experience and expertise in industrial hygiene, it would be appropriate that evaluation of industrial hygiene data be performed by the plant staff. Therefore, in the future analytical data concerning employe exposure monitoring collected by plant personnel will be forwarded to the plant for evaluation.

Evaluation of exposure monitoring data is to be provided by your staff in writing and must include recommendations for remedial action, if any is required. Completed reports are to be forwarded to this office. All such reports will be reviewed by an industrial hygienist fully certified by the American Board of Industrial Hygiene.

Program improvement needs for this office were also identified during the survey.

- Provide additional guidance, instructions and tools to aid the implementation of plant contractor safety programs.

- Improve the administration of the hearing conservation program by coordinating the implementation of recent changes with the Medical Department and by providing a guide concerning compensation for noise induced hearing loss.

- Evaluate computer aided data management methods to identify potentially useful refinery applications.

These needs will be prioritized upon completion of all plant surveys, and objectives will be established to satisfy these needs.

We would like to congratulate Mr. Rosenberg for acquiring certification in hazardous materials control. We believe that individual and Company commitment to professionalism in functional areas of responsibility will produce tangible benefits for both. We encourage you to continue professional development of the health and safety staff. In this regard, we believe that job titles should be provided which are commensurate with job responsibilities and which will reflect the professional development of the staff.

Robert A Cys

DJS:lcg
11/7:15

Attachment

RHH
~~JRS~~
CVB