

CC: U.S. Safety E

T.S. Burke

W.C. Holton

PEDRICKTOWN, N.J. PLANT INFORMATION REPORT
OSHA VISITS RELATIVE TO MASS RESIN
INCIDENT OF MAY 13TH, 1986

This report will detail information on the number of OSHA site visits to the Pedricktown Plant, the type of information requested by them and the timing that surrounded the entire sequence of events.

Two OSHA representatives, Roberto Sanchez, Safety Engineer and Theodore F. Balut, Industrial Hygienist, visited the plant on the following dates:

Tuesday, May 13, 1986

Wednesday, May 14, 1986

Friday, May 16, 1986

Wednesday, May 21, 1986

Friday, May 30, 1986

Wednesday, June 4, 1986

Tuesday, June 17, 1986

Thursday, June 19, 1986

Happenings on these dates are as follows:

Tuesday May 13 - Mr. Sanchez and Mr. Balut arrived at the plant at approximately 5 P.M. They responded due to a newscast giving the initial information of the incident. Pedricktown was about to call the OSHA regional office because five employees had been sent to the hospital. They reviewed the facts that were available at that time and viewed the condition of the Mass Resin building from a distance. They then decided to return the following day for additional information and fact finding.

Wednesday, May 14 - A walk-thru of the Mass building was done by Sanchez and Balut; several pictures were taken. A sit down meeting was held and specific information was requested by them. See attachment dated 5/16/86. A date was set for 5/21 to return for employee interviews and other pertinent information that could be of use for their investigation and a date for 5/16 to conduct personnel monitoring and sampling.

Friday, May 16 - Sanchez and Balut arrived to conduct personnel monitoring for asbestos during broken transite siding clean up and for VCI monitoring during maintenance operations. Balut conducted the monitoring and took a few more pictures and Sanchez went over specific informational items that he had requested.

NGC 14464

Wednesday, May 21 - Sanchez and Balut conducted employee interviews with three Mass Resin personnel, one lead tech and two technicians. These three BFG employees were not present when the incident occurred. OSHA's intent was to determine their knowledge levels of process procedures, emergency training, safety training and environmental understanding. They also requested additional information on process flow diagrams, GC monitoring data, equipment (autoclave) drawings and computer sketches.

Friday, May 30 - Sanchez and Balut conducted employee interviews with one instrument man who was in the building at the time of the incident, one Sr. Lead Tech from Mass Resin, one Mass Lead Tech who was present at the incident, and one Mass technician who was also present at the time of the incident. Questions were basically the same as the first interviews. Sanchez and Balut were given information concerning a corrosion study performed by Betz on 4/30/86 plus additional information on specific ball valve pressure ratings and 150 psi flange design criteria.

Wednesday, June 4 - Balut conducted interviews with the Allied Maintenance Superintendent, and four Allied Maintenance mechanics. Two of the mechanics were present at the time of the incident and had received minor injuries.

Tuesday, June 17 - Balut arrived to check the OSHA 200 logs for the last 5 years. He also checked the first aid cases for the last 5 years and talked to the plant nurse. All was in order and he was satisfied with the recordkeeping.

Thursday, June 19 - Sanchez and Balut arrived to conduct the OSHA closing conference. They explained the monitoring data collected, the engineering design problems that were found, the lack of proper training given to the Mass personnel with respect to understanding the manway closing device design, and failure to use adequate respiratory protection during VCI maintenance work. An explanation of the citations proposed as well as the abatement process was also given.

BAK-026/re
9/23/86



NGC 14465

BFGoodrich

The BFGoodrich Company
Chemical Group
P.O. Box 400
Pedricktown, New Jersey 08067
609-299-5400

May 16, 1986

United States Department of Labor
2101 Ferry Avenue
Suite 403
Camden, New Jersey 08104
Attention: Roberto Sanchez

Dear Mr. Sanchez:

Attached please find the information requested regarding our Mass Resin incident on May 13, 1986 as per our initial field inspection review on the same date. + 5/14

Mass Resin process flow diagram.

Manufacturing data report. RE-1PP (8100)

Manufacturing procedure and chemicals involved.

Computer alarm data.

Computer console technician action data.

Area monitoring data and diagram.

8100 batch history log, charge no. 65

8100 batch history log, charge no. 2069.

Rupture disc data.

8100 cooling jacket code repair 11/18/81, 10/29/84, 9/30/85

If you have any questions regarding this incident, please feel free to call me at (609) 299-5400.

Sincerely,



Jim A. Kiel,
Manager Safety/Environmental and Utilities
JAK/052/re

THE 1972 GOODYEAR - PLAQ. LA. - INCIDENT WAS REVIEWED + A COPY OF THE REPORT WAS GIVEN.

NGC 14466



Citation and Notification of Penalty

US DEPARTMENT OF LABOR - OSHA
2101 FERRY AVENUE, SUITE 403
1800 PAVILLION BUILDING WEST
CAMDEN, NJ 08104

1. Type of Violation	2. Citation Number
Serious	01

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

3. Issuance Date 7/10/86	4. Inspection Number 017779372
5. Reporting ID 0213900	6. CSHO ID S4522
7. Optional Report No. 451	8. Page No. 1 of 1

10. Inspection Date(s):

5/13/86 6/19/86

11. Inspection Site:

Route 130 & Porcupine Road
Pedricktown, NJ 08067

9. To:

B. F. Goodrich Chemical Co.
and its successors
P. O. Box 400
Pedricktown, NJ 08067

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of violation(s) cited below. The Citation must remain posted until the violations cited below have been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number

13. Standard, Regulation or Section of the Act Violated

14. Description

15. Date by Which Violation Must Be Abated

16

1
CFR 1910.1017(j)(1): The training program relating to the hazards of vinyl chloride and precautions for its safe use did not include all the requirements outlined in this section in that specific information was not provided to aid the employees in the recognition of conditions which may result in the release of vinyl chloride:

a) Mass Resin Building -- Employees were not informed of the functions of the "guiding pin" on the autoclaves, on or about 5/13/86.

b) Mass Resin Building -- Employees were not informed of the adverse effect of the use of "Never-Seez" on the lugs of closing mechanism for the autoclaves, on or about 5/13/86.

Immediately
Upon Receipt

NGC 14467

17. Area Director

HARRY D. ALLENDORF

18. \$

NOTICE TO EMPLOYEES — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RIGHTS AND RESPONSIBILITIES — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

DUPLICATE

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 (Rev. 1/84)

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VER OGDON ALLIED SERVICES CORP.

CSHO NO. 86887-118	OSHA 653
#17779	AREA
REGION 213900	

E	EMPLOYEE/SAMPLE I.D.	LOCATION	ANALYSIS FOR:	DATE SAMPLED	LAB/FIELD RESULTS	TIME WEIGHTED AVERAGE	STANDARD
MA	MAINTENANCE	BLDG. 512, MASS	ASBESTOS	5/16/86	NON-DETECTED	NON-DETECTED	2.0 f/cc
	MECHANIC	RESIN BLDG., VINYL					
		STORAGE AREA, ALLIED					
		MAINTENANCE BLDG.					
		(1 - SAMPLE, 253 mins. time)					
MA	MAINTENANCE	BLDG. 512, MASS	ASBESTOS	5/16/86	NON-DETECTED	NON-DETECTED	2.0 f/cc
	MECHANIC	RESIN BLDG., VINYL					
		STORAGE AREA,					
		ALLIED MAINTENANCE					
		BLDG.					
		(1 - SAMPLE, 264 minutes time run)					

NGC 14468

CSHO NO.	B6887-118
ARE	#1729653
213900	

LOYER OGDON ALLIED SERVICES CORP.

PLB	EMPLOYEE/SAMPLE I.D.	LOCATION	ANALYSIS FOR:	DATE SAMPLED	LAB/FIELD RESULTS	TIME WEIGHTED AVERAGE	STANDARD
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TOTAL MAINTENANCE	BLDG. 512, MASS	VINYL CHLORIDE	5/16/86	0.019 ppm	0.010 ppm	1.0 ppm
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MECHANIC
 RESIN BLDG, VINYL
 STORAGE AREA,
 ALLIED MAINTENANCE
 BLDG.
 (not a top of
 corner 8100)

4 SAMPLES OBTAINED

LAB RESULT
 NON-DETECTED

0.06 ppm

NON-DETECTED

NON-DETECTED

246 = TOTAL TIME

NGC 14469

BFGoodrich

The BFGoodrich Company
Geon Vinyl Division

P.O. Box 400
Rte. 430 & Porcupine Rd.
Pedricktown, NJ 08067

August 1, 1986

U.S. Department of Labor
Occupational Safety and Health Administration
Caeden Area Office
1800 Pavilion Bldg, West
2102 Ferry Avenue, Room 403
Caeden, New Jersey 08104
Attn: Harry D. Allendorf, Area Director

Re: OSHA Inspection Number 017779372

Dear Mr. Allendorf:

Attached please find a check for \$ 360.00 related to citation # 01 of
Inspection # 017779372.

As referenced in the closing conference with Mr. Sanchez and Mr. Balut on
June 19, 1986, the abatement of this citation has already occurred.

Engineering modifications of the Mass Resin autoclave manhead closure as
detailed in documentation given to Mr. Sanchez on June 19, 1986 have been
implemented. Departmental employees have been trained in the function of these
engineering modifications. Additionally, remedial training was conducted on
the entire Mass Process including all applicable safety, environmental and
industrial hygiene procedures. This training was completed on June 13, 1986.
The Mass Resin area was restarted on June 19, 1986.

Very truly yours,

The BFGoodrich Company
Geon Vinyl Division



R.V. Tebbutt
Plant Manager

bcc: Area Managers
J.A.Kiel/B.A.Kaswell/C.E.McCann
B.F.Lefebvre/W.C.Holbrook/H. Waltemate
File - OSHA Correspondence
- Mass Resin Autoclave Release

NGC 14471



Citation and Notification of Penalty

US DEPARTMENT OF LABOR - OSHA
2101 FERRY AVENUE, SUITE 403
1800 PAVILLION BUILDING WEST
CAMDEN, NJ 08104

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

1. Type of Violation(s)	2. Citation Number
Serious	01

3. Issuance Date 7/1/86	4. Inspection Number 017779653
5. Reporting ID 0213900	6. CSHO ID B6887
7. Optional Report No. 118	8. Page No. 1 of 2

10. Inspection Date(s):

5/14/86 6/19/86

11. Inspection Site:

Route 130 & Porcupine Road
Pedricktown, NJ 08067

9. To:

Ogdon Allied Maintenance Corporation
and its successors
P.O. Box 400
Pedricktown, NJ 08067

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of violation(s) cited below. The Citation must remain posted until the violations cited below have been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

This Citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must abate the violations referred to in this Citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your rights and responsibilities and should be read in conjunction with this form.) You are further notified that unless you inform the Area Director in writing that you intend to contest the Citation or proposed penalties within 15 working days after receipt, this Citation and the proposed penalties will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the Citation is affirmed by the Review Commission.

12. Item Number

13. Standard, Regulation or Section of the Act Violated

14. Description

15. Date by Which Violation Must Be Abated

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for illness.

1a
29 CFR 1910.1017(c)(1): Employee(s) were exposed to vinyl chloride at concentrations greater than one part per million averaged over any 8-hour period:

a) Building 512, Mass Resin Building, Maintenance Mechanic on 5/16/86 was exposed to vinyl chloride at a time weighted average (TWA) level of 8.7 parts per million (ppm), which is approximately 8.7 times the OSHA permissible exposure level (PEL) was established to prevent liver cancer. The worker was involved in a clean-up operation and was pumping material out from vessel 8100. The employee's exposure level was derived from four samples collected over a 250 minute period. The remaining 230 minutes were considered zero exposure.

Immediately
Upon Receipt

17. Area Director

HARRY D. ALLENDORF

18. Las

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EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RIGHTS AND RESPONSIBILITIES — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

NGC 14472

Citation and Notification of Penalty

US DEPARTMENT OF LABOR -OSHA
2101 FERRY AVENUE, SUITE 403
1800 PAVILLION BUILDING WEST
CAMDEN, NJ 08104

1. Type of Violation(s)	2. Citation Number
Serious	01

The violation(s) described in this Citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.

3. Issuance Date 7/1/86	4. Inspection Number 017779653
5. Reporting ID 0213900	6. CSHO ID B6887
7. Optional Report No. 118	8. Page No. 2 of 2

10. Inspection Date(s):

5/14/86 6/19/86

11. Inspection Site:

Route 130 & Porcupine Road
Pedricktown, NJ 08067

9. To:

Ogdon Allied Maintenance Corporation
and its successors
P.O. Box 400
Pedricktown, NJ 08067

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12. Item Number

13. Standard, Regulation or Section of the Act Violated

14. Description

15. Date by Which Violation Must Be Abated

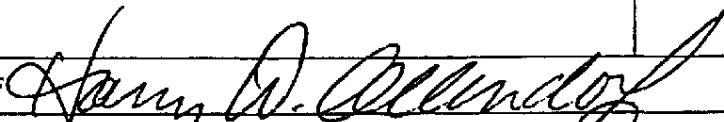
1b
) CFRA 1910.1017(g)(1): The employer did not provide a respirator or assure that the employee(s) used such a respirator as required by this paragraph:

a) Building 512, Mass Resin Building,
Maintenance Mechanic Pumping material from
vessel 8100 was overexposed to vinyl chloride
and the employee did not utilize a respirator.
The use of a respirator was not assured by
the employer as required by this paragraph,
on 5/16/86. The employee should have used
at least a Type C supplied air respirator.

Immediately
Upon Receipt

17. Area Director

HARRY D. ALLENDORF



18.

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EMPLOYER RIGHTS AND RESPONSIBILITIES — The enclosed booklet outlines employer rights and responsibilities and should be read in conjunction with this notification.

NGC 14473

OGDEN ALLIED SERVICES CORPORATION

Two Pennsylvania Plaza
New York, NY 10121
212 868 6000

August 25, 1986

U.S. Department of Labor
Occupational Safety and Health
Administration
Camden Area Office
1800 Pavilion Building West
2102 Ferry Avenue
Room 403
Camden, New Jersey 08104

Attention: Harry D. Allendorf
Area Director

Re: OSHA Inspection Number 017779653

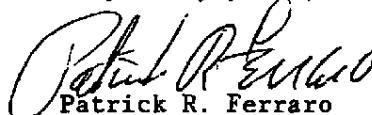
Dear Mr. Allendorf:

We have previously forwarded to your office our check for \$300 relating to Item 1a of Citation 01 of Inspection 017779563.

As referenced in the closing conference with Mr. Balut and Mr. Sanchez at the B.F. Goodrich Company Pedricktown Plant on June 19, 1986, the abatement of this Citation has already occurred, as the Citation was specific to the activities relating to the Mass incident of May 13, 1986.

Ogden Allied Maintenance Corporation, with the assistance of the B.F. Goodrich Company, has reviewed this incident and specific circumstances surrounding the Citation with all of our operating personnel. The need for use of appropriate respiratory protection when dealing with vinyl chloride during the performance of specified tasks was reinforced.

Very truly yours,


Patrick R. Ferraro
Site Supervisor

PRF/ar



cc: F. Van Lieshout/R.V. Tebbutt/J.M. Fletcher/J.A. Kiel/C.E. McCann
H.A. Yarson -- Shop Steward -- Union, Local

NGC 14474