TO: Ralph Stevens, Manager Valve Services
Major Mechanical Electrical Services Division
Elliott Valve Company

cc: Larry Rudolph
E&ISD Greentree

TRIP REPORT ON

INDUSTRIAL HYGIENE ASSESSMENT
OF

ELLIOTT VALVE COMPANY
5436 CLAY STREET
HOUSTON, TX 77023
January 19, 1988

Conducted and Reported by:
Mark A. Perriello, CIH
Senior Engineer
Corporate Industrial Hygiene
Environmental Affairs
Westinghouse Electric Corp.
R&D Center
Pittsburgh, PA 15235
March 3, 1988

PLAINTIFF'S EXHIBIT
WH-476

IN RE: ABRAMS DECEMBER 1992

An Industrial Hygiene assessment of Elliott Valve, Houston, TX, plant was conducted on January 19, 1988 by Mark A. Perriello. Ralph Smith, Manager Valve Services, and Colbert Pearson, Customer Services, provided a tour of the plant, answered questions relative to this assessment, and participated in a close-out meeting.

The recommendations which follow are a result of this assessment. The site industrial hygiene program was evaluated utilizing a Westinghouse Corporate Industrial Hygiene Assessment form, a walk-through tour, and interviews with plant personnel. Plant hazard communication, respiratory protection, hearing conservation, and air monitoring programs were reviewed in detail.

Hazard Communication Program

At the present time any manufacturer in Standard Industrial Classification (SIC) codes 20-39 and non-manufacturers SIC Code 46-49, 51, 75, 76, 80, 82, and 84, are covered by the Texas Hazard Communication Act, effective date January 1, 1986. As of May 13, 1988, all manufacturers and non-manufacturers will be covered under the expanded Federal OSHA Hazard Communication Standard 29CFR1910.1200.

The following recommendations need to be accomplished to be in compliance with both Federal and State Hazard Communication Laws:

1. Establish a written hazard communication program in accordance with 29CFR1910.1200.

2. Develop training documentation that training required by 29CFR1910.1200 has and is being performed. An example of training materials in Spanish is included with this report per your request. Training tapes also are available from ITS Training.

3. Develop a written chemical inventory of all chemical compounds. List both trade names and common chemical name ingredients.

4. Review each Material Safety Data Sheet (MSDS) for adequate information and keep MSDS in book(s) at location easily accessible for review by employees.

5. Review label on each drum or container of material for supplier's warning. Get back in writing to supplier if MSDS or label are not consistent and adequate. For example, get

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back to Dupont on mineral sand and star blast. What do they contain?

6. Adequately label all containers of chemical compounds including 55 gallon drums, storage tanks, and smaller containers used to transfer chemicals from bulk containers.

Contact Rich Wengrzyn (412)-256-1361 Westinghouse Corporate Industrial Hygiene, for assistance in complying with OSHA Hazard Communication.

Included with this report is the Texas Hazard Communication Standard and OSHA Hazard Communication Standard 29CFR1910.1200.

Respiratory Protection Program

The OSHA respiratory protection standard 29CFR1910.134 has a number of requirements that need to be addressed by this location for field work. Whenever any type of respirators (dust mask, supplied air, etc.) are used the following must be established.

1. Establish a written respiratory protection program.

2. Provide and document that each worker who wears a respirator has had a medical evaluation that indicated the worker is capable of wearing respiratory protection.

3. Provide and document atmosphere fit test for all workers who wear respirators. This can be accomplished using smoke tube or other challenge material to determine proper respirator fit.

4. Provide employees working with asbestos gasketing material an air purifying respirator with a High Efficiency Particulate Absolute (HEPA) filter.

5. To determine the adequacy of the type of respiratory protection air monitoring for each chemical hazard in question must be determined.

To help implement an adequate respiratory protection program, I have included four forms which you may use to document the adequacy of your respiratory protection. Also, I have included for your review the OSHA Respiratory Protection Standard 29CFR1910.134.

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Environmental Monitoring

Initiate a yearly air monitoring program to evaluate potential chemical exposures to employees.

The chemical inventory once developed can be used to formulate sampling study. Air monitoring should include:

1. Solvents exposure from paints, cleaning agents (kerosene, methylene chloride, etc.).
2. Welding fumes from stainless, high chrome, and nickel alloys.
3. Plasma spray (metal oxide fumes) and burn out operations.
4. Asbestos from stripping or scraping operations from valve gaskets.

Hearing Conservation Program

According to the OSHA Noise Standard 29CFR1910.95, when noise levels exceed an eight hour time weighted average 85 decibels, a hearing conservation program must be established. Several locations or operations exceed or have potential to exceed this noise level. The requirements of the OSHA noise standard which must be addressed at this location are:

1. Document measurements on all areas or operators which have potential for exceeding 85 decibels.
2. Provide and document that each employee exposed to noise levels in excess of 85 decibels are medically evaluated both initially and annually.
3. Develop documentation that training required by 29CFR1910.95 has and is being performed.
4. Provide hearing protectors (ear plugs or ear muffs) to exposed employees above 85 decibels and enforce implementation. I have enclosed the OSHA noise standard 29CFR1910.95.

Asbestos Gasketing

Asbestos gasketing material which cannot be re-used must be disposed of as asbestos waste following OSHA and EPA requirements. The gasketing material should be wetted first, separated from other material, and bagged with appropriate warning labels attached.

Comments concerning this assessment are welcome. We request that a written response to our assessment recommendations be sent to us with planned action by April 4, 1988.

Mark A. Perriello

Mark A. Perriello, CIH
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Corporate Industrial Hygiene
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APPROVED:

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