PLAINTIFF'S
EXHIBIT
CHV-433

Memorandum

San Francisco, CA
June 29, 1984

INDUSTRIAL HYGIENE FOLLOWUP VISIT
EL PASO REFINERY
File 121: CUSA Mfg.

MR. J. C. KEATING:

A visit to the El Paso Refinery was made by Mr. C. L. Kyllonen of Corporation Industrial Hygiene in April, 1983 as a followup to the industrial hygiene survey performed in June 1980. The purpose of the visit was to review the status of the recommendations made by the industrial hygiene group and to discuss any additional items of concern. As no report encompassing the 1983 visit had yet been issued earlier this year when Corporation Industrial Hygiene formalized its review and followup procedures regarding new and previous recommendations for all facilities, a return visit was made to the Refinery by Mr. Kyllonen on June 3-4, 1984. During that most recent visit, mutual agreement was reached on all items appearing in this report, which effectively supersedes the 1980 report and provides a single set of recommendations addressing all current concerns.

Summary

During the 1983 visit, thorough walkthroughs of all plant areas were conducted, accompanied by Mr. J. M. Driscoll. Particular attention was directed to facilities and work activities specifically reflected in the Corporation Industrial Hygiene survey report recommendations dated November 10, 1980. Due to operational changes with the Refinery, plant modifications, and implementation of specific Refinery measures to control potential employee exposures, many of the original 1980 industrial hygiene recommendations were determined to be satisfactorily resolved or otherwise no longer applicable. Partial descriptions of such "closed" recommendations appear in later portions of this report.

The ongoing industrial hygiene program for the El Paso Refinery should emphasize the completion of the current industrial hygiene recommendations appearing in Attachment 1, with supporting information shown in Attachments 2 and 3. The current recommendations, categorized on the basis of relative significance as explained in Attachment 1, consist of unresolved items from the 1980 report plus additional areas of concern developed during our subsequent visits and ensuing telephone conservations. As agreed upon during our June 1984 visit, we request that implementation timetables be developed for each recommendation and forwarded to us within thirty days of

receipt of this report. It was additionally agreed that followup status reports will be prepared by the Refinery and forwarded to us at six month intervals thereafter, so that our files will remain current. The side-by-side recommendation and response format suggested in Attachment 1 is adequate for the implementation timetable and followup reports.

Discussion

The 1980 recommendations regarding the control of potential worker exposures to PNA-containing streams have been superseded by recommendations encompassing all refinery streams. This change is in response to the toxicity information on refinery streams currently available, and partially in anticipation of the recently-promulgated Federal OSHA Hazard Communication Standard. That standard requires employers to establish by May 25, 1986 a system for informing employees about the chemical health hazards present at their worksite. A review of this standard is currently being coordinated by Corporation Industrial Hygiene to determine how it will apply to Chevron facilities and to develop a compliance strategy for the Company. Information and assistance in complying with the standard will be provided to Chevron facilities as it becomes available to enable them to meet the legal deadline of the standard. As the first step in complying with the standard, we have recommended that the El Paso Refinery chemical inventory be expanded to encompass all intermediate refining streams for which there is some potential for worker exposure. Additional information regarding such inventory efforts will be forwarded by Corporation Industrial Hygiene once it becomes available.

The air monitoring activities outlined in Attachment 3 have been developed as "starting point" guidelines, intended to fulfill one or more of the following purposes: to comply with monitoring requirements mandated by existing applicable Federal OSHA regulations; to determine the effectiveness of existing exposure control measures; or to provide rangefinding data for suspect activities which could result in potential worker exposures. It is anticipated that additional monitoring may also be warranted for other compounds in response to possible inquiries or complaints from workers; following implementation of operational or facility modifications within the Refinery; or in anticipation of future rulemaking currently undergoing Federal OSHA review, for compounds such as benzene or ethylene dibromide.

As part of the above monitoring program, a periodic review of the monitoring results should be performed by Refinery personnel to determine if exposure results are low indicating that monitoring of those operations can be concluded, if exposure results are elevated and engineering controls or other protective measures are needed, or if exposure results are inconclusive and additional monitoring is needed. A suggested format for this summary, and the data elements to include are shown in Attachment 4. However, if an alternative summary format containing this information is preferred, it can be used in place of the attached format. Corporation Industrial Hygiene is available to assist in the interpretation of Refinery

monitoring data wherever necessary.

Report Format

This report consists of two related segments. This memorandum plus Attachments 1-4 are provided for the use of management. They are followed by a separate second portion containing survey observations and discussions relating to the Attachment 1 recommendations and older resolved items. That portion has been compiled in a format consistent with the requirements of the Fed-OSHA regulation (29 CFR 1910.20) regarding employee access to exposure records.

We thank you for your cooperation and the valuable assistance provided by facility personnel during the visits. If you should have any questions, please contact Mr. C. L. Kyllonen at (CTN) 894-6915.

S. L. DRYDEN

CLK:jlw
Attachments

cc: Mr. W. E. Dunn
Mr. I. H. Gilman
Mr. R. S. Proctor
Mr. N. C. Zeiser