

## Interoffice Communication

To L. N. Vernon  
From D. A. Kuhn  
Date December 3, 1975  
Subject Aberdeen Chemical Exposure Abatement Conference

On November 7, 1975, I reviewed the conduct of the Chemical Exposure Abatement Program with the Aberdeen Plant. Such a review appeared timely with the publishing by OSHA of proposed standards for lead, information provided to industry that chromates have been implicated as carcinogens, two literature indications that PVC may be an active respirable dust, and some indication that tin stabilizers or their breakdown products may cause toxic reactions in plastics workers.

Monitoring dosimetry and exposure abatement to vinyl chloride are well under way at this plant. Exposures are expected to be reduced further as additional process modifications begin operating. With this chemical under control, the Aberdeen Safety Department is beginning to take a look at other toxic chemicals in their operation.

In the original exposure abatement program, phthalic anhydride was indicated to be a high hazard toxic chemical. As yet, the plant has not developed a formal program to abate exposure to it; but they have recognized the need to change work practices and make engineering modifications to the PA handling system to make it safer. The plant has now defined 10 chemicals including lead chromate and lead-based stabilizers as toxic chemicals to receive further consideration in a formal monitoring and exposure abatement program. At my visit they were just about to begin to write plans of how they would accomplish this. I pointed out that their plan was ambitious but sorely needed and encouraged them to tackle this task forthwith.

It is the plant personnel's assessment that the "resin" plant is a relatively toxic chemical-free place in which to work, but extensive changes in their compound manufacturing areas will be required to bring toxic exposures to satisfactory levels. During 1974 the Central Engineering Department made a lengthy point-by-point study of the "compound" area and determined that in a significant number of samples there was greater than the OSHA maximum permissible levels for lead and "nuisance dust" as PVC. To follow up this study, the plant had sampled again for particulate lead but at the time of the meeting had not yet obtained the analytical results.

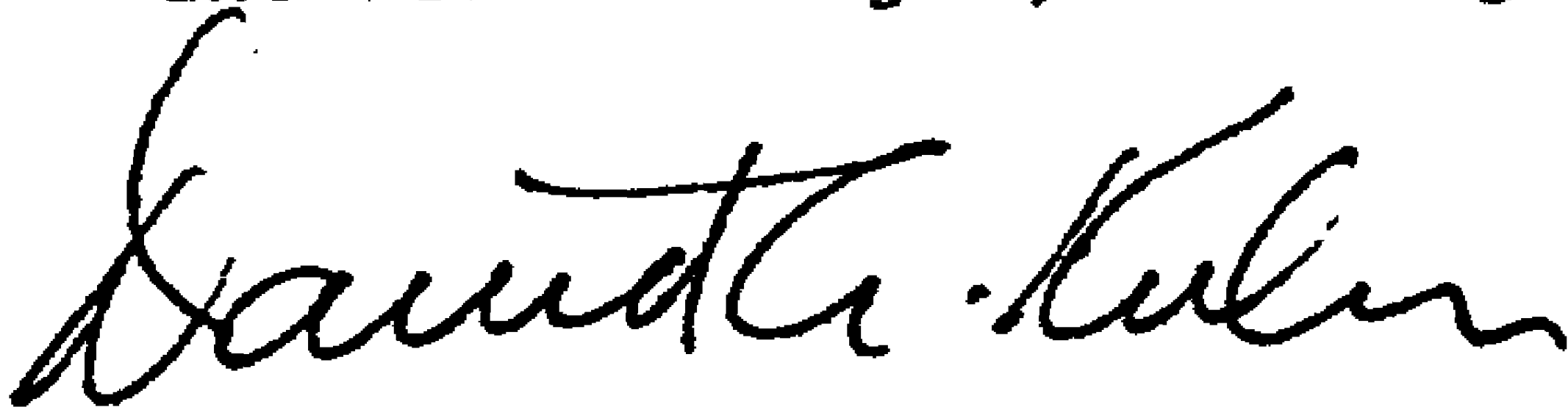
During discussion with plant personnel, I had the impression they believed that improved housekeeping, work practice improvements and regular preventative maintenance would significantly reduce the exposure to employees to dust-borne toxic chemicals. However, it also appeared that these methods would not be sufficient to obtain the full measure of abatement required; and engineering modifications, some perhaps extensive, would be needed.

L. N. Vernon  
Page 2  
December 3, 1975

Discussion with some plant personnel led me to believe that implementing housekeeping, work practice and maintenance would be difficult because of the attitude of the work force at the plant. I heard of some attitudes that indicated they felt the Company was putting its bucks up front, not out back, and the Safety Department should have been staffed with higher quality personnel.

But that's all behind us now and the Aberdeen Plant should be given every encouragement and assistance to carry forward an ambitious program of plant monitoring and exposure abatement coupled with the steps they are going to take to improve housekeeping and preventative maintenance. Their task is difficult, but I believe they are headed in the right direction.

Current Safety staff include Jerry Uptain, acting safety director, Jennie Belk, nurse, Owen Tubb, industrial hygienist, Jerry Roberts, safety inspector, and Dennis Knight, training supervisor.



D. A. Kuhn

ac

cc:

R. A. Darling

R. E. Lehmkuhl

Jerry Uptain ✓