

LOUISIANA DIVISION CONSOLIDATED AUDIT
OCCUPATIONAL HEALTH

SECTION I. EDUCATION AND TRAINING
(REF. OSHA HAZCOM 29CFR 1910.1200)

1. Is there a written Hazard Communication program?
Yes ☒ No ☐
 Last updated (date) 11/18/91
2. Show written program (HazCom manual). Bring whole manual
3. Examine orientation program for new and transferred employees.
 Does orientation for transfers differ from that for new employees?
Yes ☐ No ☒
4. Are technical supervisory, clerical, laboratory and maintenance personnel included?
Yes ☒ No ☐
5. How is this training documented? By signing of indoctrination checklist.
 Review training records. (Attach an example to the questionnaire)
6. Is there a Chemical and Physical Agent Inventory (CPAI)?
Yes ☒ No ☐
 Last updated (date) 1ST Quarter 1992
7. Does the CPAI contain all significant chemical and physical stresses?
Yes ☒ No ☐
8. Is the CPAI updated annually?
 By whom? I.H. Contact/Industrial Hygienist.
Yes ☒ No ☐
9. Is the inventory available to all shifts?
 Where? Safety and Environmental Office
Yes ☒ No ☐
 Are CPAI's reviewed with new employees? Yes ☐ No ☒
 No we have not been covering CPAI per say but we have been covering all items except one in hazard communication training. Heat stress added to HAZCOM training.
10. What is the review procedure for bringing a new chemical/physical agent into the area? Reactive chemical, Tasca check, review and hazcom review with affected personnel.
 Is Industrial Hygiene involved? Yes ☒ No ☐

11. Are current MSDS's available for all chemicals?
Yes ☒ No ☐
12. Are MSDS's available to employees at all times?
Yes ☒ No ☐
Where? Hazard communication manual. Safety/Environmental Office
13. Are written process descriptions, simplified flow sheets, floor plans and job descriptions current? Yes ☒ No ☐
14. Are all potential sources of exposure such as process sampling points, sumps and unloading/loading docks noted?
[X]NA Yes ☐ No ☐
15. Are employees informed of the stresses to which they may be exposed, and the consequences of overexposure to the stresses, on an annual basis? Yes ☒ No ☐
16. Are maintenance and laboratory personnel covered in annual retraining? Yes ☒ No ☐
17. How is this information communicated? Via asbestos and hazards communication training annually.
What is the role/involvement of supervision? Insuring compliance with training requirements and participating in training meetings.
18. How is new health effects information communicated to employed?
Via meetings and bulletin board postings
Is the communication documented? (Meetings) Yes ☒ No ☐
19. How are the results of exposure monitoring communicated to employees in a timely manner? The results are communicated via meeting as soon as possible and documented.
Show documentation.
(Attach an example to the questionnaire)
20. How are stationary containers labeled? Vessel number if container contains asbestos is marked as such with warning.

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21. How do employees determine the hazards associated with vessel/pipeline contents? Through training, line origin and destination, labels on piping, tracing lines, MSDS sheets.
22. How are portable containers labeled? With an appropriate label with reference to standard in Hazcom manual.

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SECTION II

RESPIRATORY PROTECTION PROGRAM (REF. DOW SAFETY STANDARD AND
OSHA 29 CFR 1910.134)

1. Is there a written respiratory program which has been updated
within the past 12 months? Yes [X] No []
Where is it kept? Block manual and personal computer.
Show written respirator program.
(Attach the written program to the questionnaire)
2. Who has plant responsibility for implementing the respiratory
program? I.H. Contact
3. What is the respiratory protection program for visitors and non-
Dow employees? Visitors are given escape respirator's and
trained on how to use them during an emergency.
4. Is there a regular inspection and evaluation to determine the
continued effectiveness of this program? Yes [X] No []
5. Are respirators required, provided and used for other than
escape and emergency response? Yes [X] No []
6. What types of respirators are issued for the following uses?
Escape only: A.O.R. 9722, scottoramic, Comfo II
Routine use: For asbestos Comfo II or forced air respirator.
Emergency use: Two 30 minutes scott air pak.
7. Are respirators individually assigned and have the owner's name
and date cartridge/canister was replaced recorded on them?
Yes [X] No []

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8. Has annual training been conducted in the proper use of respirators and their limitations for all users?

Yes [X] No []

Show documentation.

(Attach an example to the questionnaire)

9. Describe the training program (who conducts, methods, tests, etc.).

Plant I.H. Contact conducts training.

Training consists of:

How to change cartridge

How clean and maintain the respirator

Fit testing procedures including selection of proper selection

10. Is there a routine inspection, cleaning, and maintenance program?

Yes [X] No []

Show auditors respirator cleaning station.

Define method used for cleaning of respirators. Respirators are cleaned with ARI sanitizer deodorizer for more details see attached procedures.

11. What are the documented inspection procedures for your respiratory equipment as listed in Question #6?

Show documentation.

Documents are kept in the C-9 file in the Safety/Environmental Office.

12. Are respirators stored properly as to not cause distortion and placed in a clean environment when not in use?

Yes [X] No []

Show auditors example of storage area.

13. Has fit testing been conducted within the past two years for all routine users? Yes ☒ No ☐

Show documentation.

(Attach an example to the questionnaire)

What special provisions are made for those employees wearing eye lenses? Special frames were given to the two employees who wear glasses. They were told that Dow could pay for the lens if they wanted. So far neither has had them made up. There is really no need in our work.

14. Is the medical approval for all routine respirator users current (within the last two years)? Yes ☒ No ☐

15. Are air supplied respirators used? Yes ☒ No ☐

What is the source of air? Breathing air cylinders only on special jobs vessel entry etc.

16. Are Hansen or Schrader fittings used for breathing lines to insure against connecting into other systems?

☒NA Yes ☐ No ☐

17. If air compressors are used, what steps are taken to assure the quality of air? Do not use air compressor supplied air.

18. Are backup persons with suitable rescue equipment provided for persons working in confined spaced with supplied air?

Yes ☒ No ☐

19. Are SCBAs inspected:

Weekly by the owner (bottle pressure) Yes ☒ No ☐

Monthly by the owner (condition, alarm, regulator) Yes ☒ No ☐

Annually by Vallen Corp. Yes ☒ No ☐

Show documentation

(Attach an example to the questionnaire)

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20. Are air line systems inspected:

Weekly by the owner (bottle pressure)

[X]NA

Yes [] No []

Monthly by the owner (condition, alarm)

regulator) [X]NA

Yes [] No []

Show documentation

(Attach an example to the questionnaire)

21. What routine jobs require the use of respiratory protection?

Handling bags of raw asbestos and mixing of conductive nickel

-Comfo 2 & Kacal forced air for asbestos

-Comfo 2 for mixing of conductive nickel

22. What steps have been taken to engineer the above out?

Respirators are worn in asbestos handling room as a precaution;
also R&D is working on non-asbestos diaphragms.

VENTILATION PROGRAM

1. a. Are there any laboratory type exhaust hoods in use?
Yes [X] No []

- b. Are there any other local exhaust ventilation systems in use for operations such as drumming, bagging, welding, spray painting, solvent/degreasing tanks/etc.?
Yes [X] No []
Our system servicing: debugging, bag lifter, lab vent, conveyor (bottom level) See Attachment.

If the answer to 1a and 1b are both no, skip remainder of this section.

2. a. Are the fume hoods equipped with a flow sensing device (such as a manometer, TSI flow sensing device)?
Yes [X] No []
AT 500 has flow sensing device

- b. Is Yes, has an airflow survey been conducted within the past two years? Show documentation.
Yes [X] No []

- c. Is there a weekly check program for the flow sensing device (such as a manometer, TSI flow sensing device)?
Yes [X] No []

- d. If 2a is No, has an airflow survey been conducted within the past one year? Show documentation.
Yes [X] No []
Canopy hood is checked yearly along with AT 500.

3. Are all laboratory and local exhaust ventilation systems included in the Industrial Hygiene Preventative Maintenance Program?
Yes [X] No []

- a. Have recommendations from Industrial Hygiene Department annual check been implemented? Yes [X] No []

- b. What is the regular inspection and maintenance schedule for general ventilation systems?
Preventive maintenance performed as required yearly as according to C-9 checklist. Maintenance Coordinator will start checks in 1992.

4. Are the air intakes for the building located near any of the exhaust points for the fume hoods or local exhaust ventilation devices?

Yes [] No [X]

- a. What is the height of the exhaust stack? _____
F-509 9 feet above ground level
AT-500 31 feet above ground level

5. What type of ventilation is provided for operations such as drumming, bagging, spray painting, solvent/degreasing tanks, etc? Please list each operation and the type of ventilation currently being used.

NOT APPLICABLE

- a. Specifically what type of ventilation is provided for welding operation?

Floor fans are used while welding around boiler maker area plus building fans.

- b. Has such ventilation been evaluated? Yes [X] No []
 No Documentation

6. Are there any other specific operations that need to be evaluated to determine if ventilation is needed or required?
No

7. Are proper procedures followed for blast gates used in the ventilation system?

[X]NA Yes [] No []

8. Is the hood(s) being used for the purpose of storage and if so, is there adequate air flow to the back baffle?

Yes [] No [X]

How is the housekeeping in the hood(s)? Are there objects present that restrict adequate air flow to the back baffled?

Asbestos drying oven under canopy hood. Oven in AT-500 for non-asbestos experimental diaphragm.

9. Are control rooms under positive pressure? Yes [] No [X]

SECTION IV

HEARING CONSERVATION

(REF. DOW SAFETY STD., IHG AND OSHA STD. 29 CFR 1910.95)

1. a. Are all job classifications exposed to noise levels less than 85 dBA as a 8-hour time-weighted average (TWA) or 82 dBA as a 12-hour TWA?

Yes ☒ No ☐

List these job classifications >85 or 82 dBA.

- b. Are all plant areas and sources less than 90 dBA?

Yes ☐ No ☒

List the areas of the plant >90 dBA.

Turbine areas, CW-501, sweco filters, impact or portable equipment. Flipper operating SW, BL501 area, 501 area, C-502, operating forklift 8010.

If the answer to 1.a. and 1.b. is Yes, skip the remainder of this section.

2. Attach the Plant's written Hearing Conservation Program to the questionnaire. Need to develop plant written program.
3. Is the employee noise dose determined by personal audiodosimetry? Yes ☒ No ☐
4. Are there any areas in the plant where employees receive exposures to greater than 115 dB for any length of time?
If yes, what job assignments? Yes ☐ No ☒
5. If employees are exposed to equal to or greater than 85 dBA as an 8-hour TWA or 82 dBA as a 12-hour TWA, are they provided the following? NA or
- a. Annual training, if Yes, show documentation records (Attach an example to the questionnaire) Yes ☒ No ☐
- b. Annual audiograms Yes ☒ No ☐
- c. Hearing protectors Yes ☒ No ☐
- d. An awareness of off-the-job noise exposure Yes ☒ No ☐

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6. Are areas that exceed 90 dBA posted with proper warning and hearing protection required signs? Yes [X] No []
7. How many employees have experienced a "standard threshold shift" in hearing acuity within the last two years?
One (Retiree)
- a. Were they retrained and required to wear hearing protection? Yes [X] No []
All personnel are required to have annual training and required to wear hearing protection where applicable.
- b. Were the employees identified to unit supervision? Yes [X] No []
8. What engineering controls have you instituted to reduce noise levels throughout the plant? (A) Purchased a quieter forklift directed the 8010 forklift exhaust away from operator.
(B) Installed a portable washer to wash turbine veins if this job is needed in future. (See note at bottom of page).
9. What future plans do you have to reduce noise levels throughout the plant? Timetable? None at this time
10. Do purchased specifications for equipment include limits on noise levels when appropriate? Yes [X] No []
Forklift 30,000 lbs.
- 8-Continued (c) Adjusted block page system to 85 deibels.
(d) CV-513 pump repaired (required vibration) 84.6 decibels.
(e) BL-509 slowed motor 88 decibels swapped out bad cage bearing.
(f) Bag lifter 87-88 decibels will continue to engineer this job to lower.
(g) CV-522 93 decibels installed shroud that fit around air motor and installed muffler 84 decibels.

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SECTION V. PERSONAL PROTECTIVE EQUIPMENT/WORK CLOTHING

1. Are there written policies concerning personal protective equipment? Yes ☒ No ☐
2. Is the required protective equipment written into the job procedures? Yes ☒ No ☐
3. Is it reviewed annually? Yes ☒ No ☐
4. Is it reviewed upon the introduction of a new chemical and/or procedure? Yes ☒ No ☐
5. Please check the personal protective equipment (PPE) provided and required:

☒ Hard hat	☒ Steel toe safety shoes
☒ Slicker suit	☒ Safety glasses, side shields
☒ Rubber boots	☒ Chemical worker's goggles
☒ Gloves	☒ Other protective chemical
☒ Respirators	protective clothing (paper)
6. a. Are contact lenses permitted? Yes ☒ No ☐
 b. Are there restricted areas? Yes ☐ No ☒
7. Are product performance or test data available to support the selection of the particular type of PPE furnished? Yes ☐ No ☒
8. Who makes the decisions concerning the type of PPE supplied?
Supervisor and I.H. contact.
9. Are the Industrial Hygiene Plant Contact and/or Safety Coordinator contacted when new PPE is considered for use in your plant? Yes ☒ No ☐
10. Is all the PPE used in this plant approved by the Division Personal Protective Equipment Committee? Yes ☒ No ☐
11. Are employees trained in the proper donning and use of PPE (including inspection of PPE for defects prior to use)? Yes ☒ No ☐
12. Are employees trained in the proper removal of contaminated PPE? Yes ☒ No ☐
13. When was training last conducted? Annually

14. How is contaminated PPE cleaned or decontaminated? Please refer to the attached procedures.

Show auditors decontamination areas.

15. a. Are there proper storage areas or cabinets for gloves, slicker suits, etc.? Yes ☒ No ☐
- b. Are there specific areas for storage of in-use PPE? Yes ☒ No ☐

Show auditors examples of storage areas.

16. Are street clothes stored separate from work clothes or PPE? Yes ☒ No ☐
17. Is there a minimum in-plant dress code/policy? Yes ☒ No ☐
Cell Service abides by S-101.
18. Does the company furnish work clothes for plant personnel? Yes ☒ No ☐
19. Is Nomex fire resistant work clothes being furnished for individual use? Yes ☐ No ☒
20. Are clean work clothes required each day for plant personnel? Yes ☒ No ☐
21. Where are company-furnished laundered? ☒ NA Disposed of daily
- a. On-site NA
- b. Off-site, commercial laundry NA
Off-site, at home NA
1. Are there potential contaminants that could be transported in the clothing? Yes ☐ No ☐
What contaminants? _____
2. If at a commercial laundry, have they been notified of the potential contaminants via MSDS or equivalent data sheet? Yes ☐ No ☐

SECTION VI

DATA GENERATION AND MONITORING

1. Monitoring is done by whom? I.H./Safety person
2. Have all chemical and physical stresses with a priority rating of 2 or 3 been evaluated? Yes ☒ No ☐
 What are the chemical/physical stresses? Noise, heat, physical asbestos, kynar 32, triton DF-12, triton X-114, cobalt naphthenate, dimethylaniline, lube oils, mekp, nickel, pst pipe sealant, loctite, styrene monomer, weld sealant, grade AA loctite, Betz polymer 1165L.
3. Who does calibration of I.H. sampling equipment? I.H./Safety person.
 What is the frequency of calibration? Before and after each use.
4. Is there an annual report of the plant's industrial hygiene activities? Yes ☒ No ☐
5. Are the results of the recommendations of the previous year's report shown as conclusions (or a status update) in the following year's report? Yes ☒ No ☐
6. Show auditors the most current annual report along with the raw data documentation (ie. original data, instrumentation calibrations, sample record sheets, calculation sheets, training records, etc.).
7. Is a continuous leak detector in use? Yes ☒ No ☐
 For what chemicals? Fuel Gas
8. Is the maintenance and calibration of the leak detector done according to a written procedure? Yes ☒ No ☐ NA ☐
9. What is done with the data generated by the leak detector?
 NA ☒

MARCH 13, 1992

**CELL SERVICE'S ANNUAL REPORT IS BEING REVIEWED AT
THIS TIME. THE REPORT AND DOCUMENTATION WILL BE
AVAILABLE AT THE TIME OF AUDIT.**

SECTION VII

ASBESTOS (REF. DOW LOUISIANA DIVISION ASBESTOS HANDLING REQUIREMENTS AND OSHA 29 CFR 1926.58 OR OSHA 29 CFR 1910.1001)

1. Is there any asbestos (insulation, gaskets, transite, etc.) in the plant? Yes ☒ No ☐

IF THE ANSWER IS NO, SKIP THE REMAINDER OF THIS SECTION.

2. Has all asbestos material been identified and labeled? Yes ☒ No ☐

3. Are "DANGER" signs posted to alert employees to the hazard? Yes ☒ No ☐

4. Are permanent records (inventory) available showing the location of asbestos materials? Yes ☒ No ☐

5. Are asbestos containing materials inspected yearly for signs of deterioration? Yes ☒ No ☐

6. Are plant specific job procedures available for work involving asbestos materials? Yes ☒ No ☐

7. Has training (health hazard, PPE, removal procedure, OSHA Regulations, etc.) been completed for all employees who work with asbestos? Yes ☒ No ☐

Show documentation.
(Attach an example to the questionnaire)

8. Has monitoring of personal exposures to asbestos been conducted? Yes ☒ No ☐

9. Were all job classifications exposed to less than 0.1 f/cc as a 8-hour TWA? or 1.0 ff/cc for 30-minute excursion? Yes ☐ No ☒

10. Is there a program to identify asbestos containing materials prior to demolition, renovation, maintenance and removal operations? Yes ☒ No ☐

11. Is there a current copy of the OSHA Asbestos Regulation and the Louisiana Division Asbestos Handling Requirements?

Yes ☒ No ☐

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SECTION VIII

RADIATION

1. Are sealed sources, X-ray producing material or loose isotopes of radioactive material present?

Yes [] No [X]

If the answer is No, skip remainder of this section.

2. Are radiation sources/areas conspicuously posted with the radiation caution system and the words "Caution: Radioactive Materials"? Yes [] No []
3. Are licensed radioactive materials (e.g., sealed sources) secured against unauthorized removal? Yes [] No []
4. Is the Certificate of Responsibility signed? Yes [] No []
5. Are manways large enough to allow vessel entry, on vessels with a radioactive source, posted "Caution - High Radiation Area"? Yes [] No []
6. Is Industrial Hygiene consulted prior to entry of a vessel with a radioactive source? Yes [] No []
7. Does the hazard training program include radiation? Yes [] No []
8. Are radioactive sealed sources painted with yellow paint? Yes [] No []

12. Is there a current program to evaluate asbestos gasket replacement materials?

Yes ☒ No ☐

13. Has any asbestos been removed within the past 12 months?

Yes ☐ No ☒

Describe: _____

14. Are there any further asbestos abatement plans?

Yes ☐ No ☒

Describe: _____

SECTION IX

GENERAL - INDUSTRIAL HYGIENE

1. Where do employees store their lunch? Lunch room refrigerator
 2. Where do employees eat or drink? Lunch room/non-operating area
 3. Is food or tobacco carried into process areas, laboratories, or other areas where chemicals are present?
Smokeless tobacco permitted in all area. Yes ☒ No ☐
 4. Is there a mandatory shower policy? Yes ☐ No ☒
For all employees? Yes ☐ No ☒
 5. Is there a written policy concerning the washing of face and hands before eating or smoking? Yes ☒ No ☐
 6. Are toilet, showers, and change rooms and number of lockers adequate and clean? Yes ☒ No ☐
 7. Are there any improvements which should be made in the change rooms and lunch rooms? Yes ☐ No ☒
 8. Is there evidence of "tracking" of chemicals from one area to another? Yes ☐ No ☒
Explain: _____

 9. Do job procedures adequately define the hazards of the job and the protective equipment required? Yes ☒ No ☐
 10. What shift schedules are worked?
Days only 6:00 a.m. to 2:30 p.m.
 11. Are there any specific problems which could be eliminated/reduced by additional engineering control? Yes ☐ No ☒
What are they? _____

- Is there an action plan to control them? Yes ☐ No ☒

12. Are there any work practices or procedures that could be changed in order to reduce or eliminate exposures to stresses?

Yes [☒] No [☐]

What are they? Some ergonomic evaluations can be done. Kent Smith will contact Cell Service to identify these areas.

13. Are any chemical(s) controlled by specific OSHA or state health standards (acrylonitrile, vinyl chloride, etc.) or EPA 5(e) consent orders?

Yes [☐] No [☒]

14. What input does Industrial Hygiene contribute prior to process changes, plant modifications, and new constructions?

Help audit prior to process changes, plant modifications, and new construction. Write letters of support for new capital projects.

15. What is being done to prevent skin contact with chemicals?

Implemented decontamination procedures and PPE use.

16. Is dermatitis a problem at this location? Yes [☐] No [☒]

17. Are solvents used for degreasing and cleaning being used with precaution?

Yes [☐] No [☒]

SECTION X

GENERAL - MEDICAL

1. What medical surveillance testing is performed for the employees in this plant and at what intervals?

Annually - audio, chest X-ray, pulmonary function, doctor exam,
health history questionnaire.
Bi-annually - blood work, lab work, plus annual items.

2. Does this plant have OSHA mandated medical surveillance?
If yes, for what chemicals or physical agents?

Yes [X] No []

Asbestos

3. Are the content and rationale for the medical surveillance program communicated to the employees? Yes [X] No []

4. a. Are the results of medical surveillance testing communicated to plant supervision (group data)?
Yes [X] No []

- b. Are individual employees informed of their medical surveillance results?
Yes [X] No []

5. Is the Medical Department asked to review an employee's medical history and any restrictions when he/she transfers into this plant?
Yes [X] No []

6. a. Plant/department utilize first aid station to treat minor industrial injuries
Yes [] No [X]
b. All industrial/illnesses are treated at the Louisiana Division Medical Department.
Yes [X] No []

**SECTION XI
NON-DOW EMPLOYEES**

1. What are the orientation programs for "short-term" (hard money) contractors and "long-term" (nesters) contractors?

Short term - Division and department orientation.

Long term - Same as above plus monthly training tropic.

2. How are they informed of the potential hazards they may be exposed to and the evidence of control of these hazards?

Block orientation checklist: Continuos intervention and annual Hazcom training.

How is this documented? Each employee is asked to sign/date the block orientation checklist for meeting agenda.

Show documentation. (Attach an example to the questionnaire)

3. Are MSDS's available to non-Dow employees? Yes [X] No []

4. Is Industrial Hygiene monitoring of non-Dow personnel performed? Yes [X] No []

If yes, are non-Dow employees appraised of their monitoring data in a timely manner? Yes [X] No []

How? One on one and safety meeting after receiving results.

5. How is new health effects information disseminated to non-Dow employees? Hazcom training and bulletin board postings.

6. Are respirators used by non-Dow employees? Yes [X] No []

7. Do you supply respirators for non-Dow employees? Yes [X] No []

Scott O Ramic/Scott Air Pac

8. Is it verified that non-Dow employees are fit tested, medically approved and trained for respirator use?

Yes [X] No []

9. Do you supply hearing protection to non-Dow employees?

Yes [] No [X]

On emergency basis, hearing protection would be provided.

10. How is the employer of non-Dow employees informed of noise exposure levels that would activate the OSHA Hearing Conservation Program (training, annual audiogram, etc.)?

Have not been informed of this in the past; will implement in 1992.

11. Are non-Dow employees required to wear personal protective equipment (PPE) as a part of the job?

Yes [X] No []

12. Do you provide PPE used by non-Dow employees? Yes [X] No []

13. Who launders PPE used by non-Dow employees?

NOT APPLICABLE

14. Where do non-Dow employees eat or drink?

Lunch room or non-operating area. (Outside doorway-Coke machine)

15. Are change/shower rooms supplied for non-Dow employees?

Yes [X] No []

16. Is medical surveillance testing performed on contractor employees?

Yes [X] No []

17. Who is responsible for contractor medical surveillance testing and how is it audited?

1992 will be the first year for this program.

18. Are contractor medical surveillance programs in compliance with applicable OSHA standards for this plant?

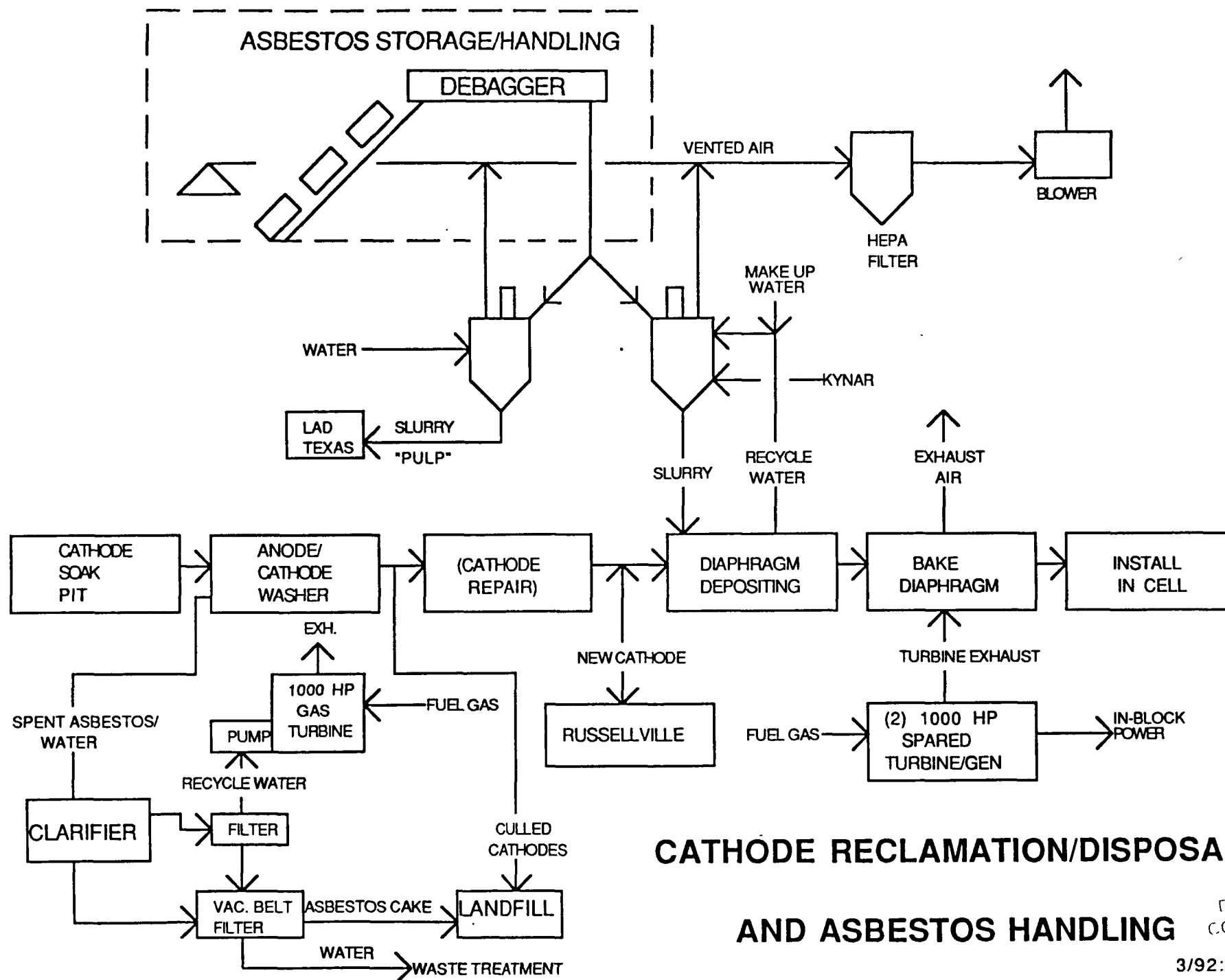
Yes [] No []

Will be implemented in 1992. Presently, division working on.

19. Are the summary results for contractor medical surveillance communicated to plant supervision?

Yes [] No [] \

Will be implemented in 1992. Presently, division working on.



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ANODE RECLAMATION AND CELL FRAME

RECLAMATION/DISPOSAL

