SHELL OIL COMPANY

REFERENCE 02-WLR-1

PRIVATE AND CONFIDENTIAL

DATE MAY 9, 1972

TO REFINERY MANAGERS
ANACORTES ODESSA/CINIZA
HOUSTON WILMINGTON
MARTINEZ WOOD RIVER
NORCO

FROM GENERAL MANAGER - REFINERIES
HEAD OFFICE

AGENCY INDUSTRIAL HYGIENE

This is further to our memorandum of March 10 on refinery industrial hygiene programs. After consideration of comments received from three locations in response to our memorandum and reviewing results of an industrial hygiene survey at Wood River, we have decided to recommend action in four specific areas.

1. Atmospheric Monitoring

All locations are to proceed with sampling of refinery atmospheres for presence of toxic vapors as discussed in our March 10 memorandum. In deciding which of the substances we listed should be included in the vapor sampling program, an assessment should be made at each refinery as to whether a material is processed or handled in such a way that exposure to unprotected personnel might be expected to approach the TLV values specified in the OS&H Standards. In regard to frequency of testing, we believe quarterly sampling will suffice for most situations, providing a sufficient number of measurements are performed to provide good documentation of the typical exposure of employees under various circumstances.

2. Asbestos Precautions

Continuing emphasis should be placed on precautions to avoid situations involving potential for exposure of employees to inhalation of asbestos particles. Until such time as Head Office industrial hygienists undertake field measurements to determine atmospheric concentrations of asbestos fibers, approved respirators should be utilized by all employees exposed when any procedure involving insulation containing asbestos results in a visible emission of dust. It is also necessary that we adhere to the various provisions included in the emergency temporary standard on asbestos issued by OSHA on December 7, with special attention to segregation and removal of asbestos waste and avoiding dry sweeping of any asbestos dust. A permanent standard on asbestos will be issued on June 7 and we will forward additional guidance on this subject at that time, if necessary.

3. Hearing Protection

In conjunction with implementation of refinery hearing conservation programs, special attention should be directed toward education and enforcement programs in use of ear protection to minimize potential for exposure of unprotected personnel to noise levels in excess of those specified in the OS&H standards. We anticipate

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