

Interoffice Communication

To Don Sanders

From Tom Grumbles

Date May 13, 1980

Subject INDUSTRIAL HYGIENE INTERFACE WITH PED

As a result of the growing regulatory arena in environmental and occupational exposure matters, it is becoming increasingly important that the industrial hygiene aspects of new process designs be considered. Simply, it has been demonstrated that industrial hygiene review and input during project development can control and eliminate many problems from occurring after start-up. As a result of strict permitting requirements the environmental review input is clearly defined. However, it may not be as clear as to what the industrial hygiene input/review of PED projects would involve. Following are some of the stages and areas of project development into which we would have input.

1. As a project is initially discussed or planned we would like to know what chemicals, products, by-products and intermediates might be encountered. At this early point we would express concerns or problems anticipated with respect to occupational exposures to these chemicals or other agents. We would indicate applicable OSHA standards and potential cost of compliance with these standards. With highly regulated chemicals such as vinyl chloride, compliance costs can become a significant factor in project feasibility. Where such compliance is necessary, we would also discuss management of the potential hazards.
2. As a project develops we would want to review project documents to assure that control schemes and potential costs had been adequately defined and anticipated. Specific recommendations could be given on items such as ventilation requirements, chemical handling or sampling systems, and breathing air supplies.
3. When a project is designed and plans drawn, we would review the plans with project engineers. We would focus on the sources of recognized problem areas and the adequacy of proposed controls. We would also make recommendations on such things as the adequacy of safety shower and eyewash locations.
4. After the final design stages are completed we could assist in developing handling procedures and the aspects of operator training dealing with the toxic properties of the chemicals they are to encounter.

It has been demonstrated that this type of industrial hygiene project review can provide maximum reduction in employee exposures with minimal cost. This type of effort can often avoid expensive retrofit of equipment necessary to comply with occupational health standards. This type

Don Sanders
Page 2
May 13, 1980

of review, although not on the same scale, can also be applied to small plant projects being done for exposure control purposes.

The principles I've listed are fairly general. Please call if you would like specifics on any of the items. I look to you for suggestions on how to affect this type of review, and would like to talk with you further regarding this subject.

Thomas G. Grumbles

ajo