

April 28, 1987

BURLINGTON N.
INDUSTRIAL HYGIENE OBSERVATIONS
FOR T. L. JENNINGS CONSIDERATION

COMPLIANCE WITH THE OSHA VINYL CHLORIDE STANDARD IS A PROBLEM.

Work in the resin building can be conducted without a respirator if the flashing red light alarm is not on. With the red light on, employees may "pass through" the area but not "conduct" work. The red light identifies concentrations >5 ppm but does not indicate if it's 6 or 40 ppm. This commonly produces exposures >1 ppm as an 8-hour average (the OSHA Permissible Exposure Limit is 1 ppm and the 15 minute limit is 5 ppm). Respirators are required for some tasks like reactor cleaning but many tasks are conducted without respirators.

Exposure monitoring is conducted by handing out the monitoring devices at the beginning of the shift and collecting them at the end. This does not assure the device was on the designated individual during the sampling time. There are indications results of the monitoring may not represent some actual job exposures. This results in collecting numbers to comply with monitoring requirements of the OSHA standard but they are not useful to try to evaluate actual job exposures.

PIGMENT MIXING IN CALENDERING NEEDS SOME ATTENTION.

Some exposure monitoring for heavy metal exposures (Pb, Sb, Cd, Cr) has been conducted but more is needed to evaluate job exposures. Exposures should be acceptable but there is concern because of evidence material may be handled carelessly. For example, in addition to substantial material accumulation in the area, there was gross contamination in about 20% of the pigment containers themselves.

JOB IN THE DEVELOPMENT LAB NEED EXPOSURE EVALUATIONS FOR LEAD.

A new operation and use of dry, small particle lead material to support Burlington S. has begun. There has been some attention to isolation and ventilation of the material. Effectiveness of controls cannot be determined unless adequate exposure monitoring is conducted. The manager of that area handles the lead material in such a way that it appears he is not convinced that lead is a material of concern that needs control.

GENERAL OBSERVATIONS

The OSHA industrial hygiene inspection should not be a problem for Pb or As in calendering. The Pb situation in the development lab is unknown. If they do their job correctly, OSHA will find overexposures to VCM in resins.

Rich White is a capable person but insufficient resources are being provided for industrial hygiene needs.

Relationships with the medical surveillance interface have been very strained in the recent past but that may be improving now.

A handwritten signature in cursive script, likely reading "JWS", is positioned to the right of the main text block.