



TENNECO OIL COMPANY P&M
(COMPANY)

INTEROFFICE COMMUNICATION

TO: TENNECO INC.
FOR: JOHN HEUSSNER
FROM: P. J. HUGHES
RE: THSR QUESTIONNAIRE

DATE: AUGUST 19, 1985

Enclosed are completed THSR questionnaires for the Tenneco Polymers,
Burlington and Pasadena locations.

Contact me if you require any additional information.


P. J. Hughes

PJH/jw

Enclosure

TEN 1075

TENNECO HEALTH AND SAFETY REVIEW

Date of Review

Tenneco Inc. Reviewers

PART I - FACILITY DESCRIPTION

1. Division: Tenneco Oil P&M Facility Name: Tenneco Polymers
Location: Burlington, NJ

Division Representatives and phone numbers

Philip J. Hughes 713/757-4036

2. Facility Representatives

Plant Manager Ron Neugold Phone No. 609/386-9200

Safety Coordinator: Charles Wunder Phone No. 609/386-9200

a. Are layout drawings of the facility available for review

☒ Yes ☐ No

b. Property acreage Approximately 150 acres

c. Numbers of buildings See Plot Plans

d. Size, use, and construction of buildings

<u>Use</u>	<u>Size</u>	<u>Construction</u>	<u>Date constructed</u>
1. See Plot Plan			Mostly constructed between 1962 and 1965. Second line of compound plant built in 1974.
2.			
3.			
4.			

e. List and describe other structures which are present at the facility (storage tanks above and underground, process units etc.)

1. See Plot Plan
- 2.
- 3.
- 4.

3. What are the principal products produced or activities at this facility:
PVC resins and PVC compounds

Briefly describe the process for manufacturing these products.

PVC resin - batch process using both suspension and dispersion reactions.
PVC compounds - batch blending process. See process flow diagrams.

4. Please provide brochures or other literature which describe the facility.
None available.

5. What type of fire protection do you use?

1. **Inside plant (briefly describe)** Fully looped firewater system with 3 auto start pumps having a total capacity of 5500 gpm. Fixed detection and automatic deluge systems for process areas and storage tanks, sprinkler protection in warehouse buildings.
2. **Outside plant assistance (briefly describe,**
Volunteer fire department located within 1/4 mile of plant. Visits the plant at least annually to pre-plan potential incidents.

6. Please provide the name(s) and type of industries near the facility?
Public service electric and gas - utility.

PART II - EMPLOYEE DEMOGRAPHICS AND CHARACTERISTICS

1. What is the total number of employees at this location? 237
2. How many employees work each of the following shifts: 1st shift 130
2nd shift 35 3rd shift 35
3. Do employees work straight or rotating shifts? ☐ Straight ☒ Rotating
4. For the plant workers, provide the number of workers in each sex and age class:

	<u>Male</u>	<u>Female</u>
25 or younger	12	0
25-34	46	1
35-44	68	3
45-54	72	4
55-64	28	3
65 and over	0	0

5. What is the average age and tenure of plant workers?

Average age is 42-1/2.

Average length of service is 17 years.

6. Do you operate a normal work schedule - 8 hr. shift - 40 hr/wk? If no, or continuous operations, please describe work shift patterns.

Administrative and maintenance employees work a regular 40-hour schedule. Operations employees work a rotating 28-day schedule.

7. How many employees are classified as maintenance workers?

There are 26 full-time maintenance employees.

8. If unionized, what union represents these workers?

OCAW

Which union local represents the workers of your specific plant?

For resin plant local # 8-890

For compound plant local # 8-716

9. Do you regularly hire temporary workers? ☐ Yes ☒ No

PART III - WORKERS' COMPENSATION AND OTHER LEGAL LIABILITIES

1. What were the OSHA incidence rates for each of the past five years?
Total recordable? Lost workdays?

Year	Total Recordable Cases	Lost Workday Cases	Total Lost Workdays
1980	5.9	0.7	27.2
1981	8.5	0.7	30.5
1982	4.8	0.5	6.7
1983	3.1	0.0	0.0
1984	3.4	0.4	7.2

2. If self insured: N/A

- a. How many worker compensation claims were filed during each of the past five years? What were their amounts?

Year	No. of Claim	Amount (Including Reserves)

- b. Are there any contested worker compensation claims? ☐ Yes
☐ No If yes, what is the cause and current status of these claims?

c. Have there been any health related claims? ☐ Yes ☐ No

If yes, explain?

3. In your opinion what percent of worker compensation claims are legitimate? _____% No comment

4. Have there been any OSHA inspections during the past five years?
☐ Yes ☒ No Last inspection 1976, scheduled Industrial Hygiene survey
What were the nature of these inspections? Were citations issued? What
was the amount of the fine? N/A

5. Please list the names of the physicians who attend injured workers.
Also indicate if they are board certified in occupational medicine.

Name	Certified (Yes or No)
Dr. Venditti	Yes

6. Do you provide a pre-employment physical examination? ☐ Yes ☒ No
If yes, please provide a copy of the medical evaluation form.

Pre-placement physical examinations are provided.

Do the same physician(s) listed in No. 7 conduct these physicals? ☒
Yes ☐ No

7. Do you provide periodic physicals for the plant workers? ☒ Yes ☐ No
Annually for those with less than 10 years service and semi-annual for those with 10 or more years service.
8. Is there a plant nurse? ☒ Yes ☐ No. If yes, please list the names and training of each nurse. Is there a nurse for every work shift? ☐ Yes ☐ No

Training (R.N., L.V.N., Other specify)		
Name		Shift
Joyce Russell	R.N.	First shift 4 days per week

9. If you answered question 8 "No", briefly explain how on-the-job injuries are handled.
There are a minimum of 2 employees on each shift trained in multi-media first aid.

10. Do you conduct pre-retirement or pre-termination physical exams?
☐ Yes ☐ No
Depends on circumstances. Frequency of periodic physicals would generally be considered as satisfactory.

PART IV - MANAGEMENT

1. Who is responsible for coordinating safety and health at the facility?

Name: Charles Wunder Title: Safety Supervisor

2. Is there a written safety and health policy? ☒ Yes ☐ No If yes, please provide.

3. Who is responsible for implementing the OSHA Hazard Communication standard? Name: Fred Kanzler Program development and assistance in implementation is being provided by division staff.

4. What type of employee safety and health training programs do you conduct? (Briefly describe)

Required VCM training, respiratory protection, hearing conservation, forklift operator training, use of fire suppression equipment, emergency procedures, etc. Additionally, monthly safety meetings are conducted which address specific plant needs.

5. What are the peak production months? Varies with market conditions

Does the work force increase during these months? ☐ Yes ☐ No

6. Are change/shower rooms available? ☒ Yes ☐ No

PART V - PHYSICAL RISK

1. Do you have a written accident investigation procedure? ☒ Yes ☐ No

If yes, please provide.

Accidents investigated include employee occupational injuries and illnesses, reported property damage, reported near misses, vehicle accidents, and liability claims involving company property or equipment. Tenneco Oil Safety and Tenneco Inc. Insurance procedures are used.

2. What are the known physical hazards in the facility? (Noise, radiation, heat, asbestos etc.)

Heat in compound area during summer months. Study and report done summer 1984. Asbestos has been encapsulated. Noise areas have been identified.

3. Do you have written procedures for lockout/tagout confined space entry, working at heights, etc.? ☒ Yes ☐ No If yes, please provide.

Copy attached.

4. Do you have a written emergency evacuation plan? ☒ Yes ☐ No

5. Do you have a written outside contractor program? ☐ Yes ☐ No

There is an orientation program for all contractors which includes a review of plant safety rules and emergency procedures.

6. Are safety showers and eye washes available in the plant? ☒ Yes ☐ No

If yes, is there a written policy for frequency of inspection? ☐ Yes

☐ No

There is a documented monthly inspection program.

What sampling equipment is available? Low flow DuPont pumps for VCM, high flow MSA and Bendix pumps for lead. 2 - HNU for search and secure.
5 - combination combustible gas and oxygen meters.

Who is responsible for calibration of this equipment?

Personnel sampling pumps are calibrated by the Industrial Hygiene Technician.
Portable instruments and Bendix continuous monitoring system are done by maintenance.
The J&W continuous monitoring system is done by an outside contractor.

11. Do you conduct any biological monitoring? ☒ Yes ☐ No
As required in 29 CFR 1910.1017 (k) and 29 CFR 1910.1025 (j)

12. Are records kept at the plant on air and biological monitoring? ☒ Yes
☐ No

13. Are there automatic air monitoring systems for any of the plant processes? There is a fixed Bendix monitoring system for VCM which has 85 sampling points that are monitored every 15 minutes. In addition there is a J&W combustible gas monitoring system which will activate the water deluge systems.

PART VI - CHEMICAL RISK

1. Do you maintain an inventory for purchased chemicals? ☐ Yes ☐ No
If yes, please provide a list of these chemicals and include estimated annual quantities used. The plant is in the process of compiling a list and a copy will be provided when it is completed.
2. What chemicals do you produce? Please provide a list of products, intermediates, and waste by-products. What are the annual quantities of each chemical? PVC suspension resin - approx. 54 million pounds annually. PVC dispersion resin approx. 40 million pounds annually. PVC compounds, rigid, semi-rigid & flexible - approx. 55 million pounds annually. *See Below
3. How are products shipped to "downstream" users? (Rail, truck, etc.)
Less than 10% by rail, the rest by truck.
4. How are waste by-products disposed of? (Briefly describe)
Solid non-hazardous waste is hauled by truck using contractors to landfill. Hazardous waste is drummed and hauled offsite by contractor for incineration/landfill.
5. Do you have a written procedure for acquiring MSDS's on purchased chemicals? ☐ Yes ☐ No If yes, please provide.
As part of purchasing, MSDSs are required prior to purchase and with initial delivery.
6. Are MSDS's available on all substances? ☐ Yes ☐ No Where are they kept? A master set is kept in the safety/industrial hygiene office.
7. Is personal protective equipment (PPE) provided for any operation in the plant? ☒ Yes ☐ No Where and under what condition is PPE required? Head, eye and foot protection is required at all times. Respiratory protection is required for designated tasks and during emergency conditions. Designated tasks are primarily those which involve opening or working on systems in VCM service. Respiratory protection is also required in the compound plant when lead is in use. Other personal protective equipment used, based on the task would include fall protection, coveralls, slicker suits, etc.
8. Is there a written procedure for inspection of PPE? ☒ Yes ☐ No
There is a written procedure for the inspection and cleaning of respiratory protection equipment.
9. Do you have a hazardous chemical labeling program? ☒ Yes ☐ No
For VCM and lead. A program for other chemicals is being developed.
10. Is there a documented air sampling program? ☒ Yes ☐ No
who conducts the sampling? Name: Industrial Hygiene Technician TEN 1085

*There are no intermediates and waste by-products consist of non-recoverable resin and laboratory waste.