

REG: JCL: MMG: (RF)
XF: LCVCM

TO: R. A. Conrad

FROM: T. G. Grumbles

DATE: July 30, 1986

Interoffice
Communication

SUBJ: LCVCM INDUSTRIAL HYGIENE AUDIT

VISTA

The subject audit was conducted on July 13-14 by Michele Goodreau, Laurie Mauerman, Dr. Drumwright, and myself. During the audit, plant policy and procedures relating to industrial hygiene and monitoring results were reviewed, a walk-through survey of the plant was conducted and interviews with 5 employees were held. Employees interviewed included the plant superintendent, shift supervisor, maintenance supervisor, maintenance lead and laboratory supervisor. Following are the audit team's comments and recommendations.

The plant industrial hygiene program is in good order and exposures to the major contaminants of concern, EDC and VCM, are well below applicable exposure limits during normal operating conditions. Installation of the EDC product sampling system has further reduced the EDC exposure potential. The recent revision of the breathing air drop stations is a positive addition to the plant respirator program. The boxes keep the points generally free of contamination and are highly visible for easy identification. Recent bench testing of the SCBA regulators is another positive addition to the respirator program and consideration should be given to doing the testing routinely as was indicated. Employee interviews indicate a good general knowledge and awareness of the hazards present in the plant. General housekeeping in the process, maintenance and off-site areas is good.

RECOMMENDATIONS

Following are the team's specific recommendations:

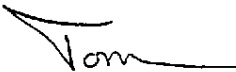
1. Respiratory Protection - Several recommendations are made in this area:
 - A. A specific statement of procedure should be added to the written program regarding the process for refilling SCBA units after use.
 - B. The use of spectacle kits for employees needing eyeglasses while wearing full-face equipment should be reemphasized, and the availability of the kits reviewed, with employees.
 - C. A statement regarding the cylinder watch requirement policy should be added to the written program.
 - D. The procedure for testing purchased breathing air quality should be formalized and followed. It should assure that purchasing notifies the lab when a new shipment arrives in-plant.

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- E. The criteria for determining the respiratory protection needs for confined space welding should be reviewed. No specific procedure, or consistent criteria is currently used.
 - F. The procedure for responding to leak alarms should be revised to require the availability of respiratory protection equipment during leak response and include criteria for donning the equipment when high concentrations are encountered.
- 2. The Confined Space Entry Procedure is currently being revised. In the context of the revision the following should be done.
 - A. Assure consistency of procedures with Appendix B of the Respiratory Protection Program.
 - B. Avoid the use of phrases such as "knowledgeable person" and "adequate protection". Where possible be specific or quantitative.
 - C. A plant definition of confined spaces should be included.
 - 3. The plant asbestos removal procedure should be revised to assure compliance with the recently revised OSHA Asbestos Standard.
 - 4. The personal protective equipment requirements for the acid loading rack should be clearly posted on and around the rack.
 - 5. The conditions during personal sampling should be accurately indicated in the computerized industrial hygiene recordkeeping system. Specifically, deficiencies were noted in indicating respirator use and turnaround conditions.

These recommendations were discussed at length during the closing conference, therefore, little discussion of the rationale for them is included in the report text.

I would like to thank plant personnel for their time and cooperation during the audit. Steve's pre-audit preparation was good and allowed us to use our time in-plant efficiently. Members of the team are available to assist in implementing any of the above recommendations.


Thomas G. Grumbles

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cc R. T. Ferrell
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