

Monsanto

FROM NAME LOCATION PHONE S. D. Paul Dept. of Medicine & Environmental Health G2WB (4-8835)

RHM 2/21

b131

PLAINTIFF'S EXHIBIT

MON-3129

DATE February 14, 1983

SUBJECT Texas City IH Monitoring

REFERENCE SDP plant visit 2/8-10/83

TO D. N. Campbell - 1890
R. T. Hammann - 1890

G. W. Buttler - G2WB
C. F. Callis - G5WA
J. T. Garrett - G2WB
J. L. Henshaw - G2WB

MAP 001449

Attached is the routine sampling program which was developed by Dan Campbell, Ray Moore, and Steve Paul during the week of February 7, 1982. This program represents the minimum requirements to maintain a quality, sustaining IH monitoring program. As you are aware, it is necessary to recognize a health concern before it can be evaluated or controlled. The ability to recognize through monitoring is critical to all downstream areas such as hearing conservation, respiratory protection, training, protective equipment, etc. The routine program does not include special monitoring (e.g., start-up, turn-around, request, etc.) and may need to be increased commensurate with future monitoring results and good IH sampling strategy. *RH*

Texas City has committed to determine exposures during evening and night shifts and to pursue a monitoring program which includes worst case exposures. Although the net result of this routine monitoring program is to decrease the total number of samples/analyses per year, it is extremely important that every effort be made to direct existing manpower into such areas as hearing conservation, respiratory protection, training, MEHI, and other areas that currently need attention. Note that the routine monitoring program does not include many STEL type samples since results have been so low in most cases the past 2-5 years. If exposures increase to the action level for any material, STEL samples will be increased to assure employees and the IH group that exposures are quantified and data is effectively evaluated. As results increase, monitoring frequency may increase the overall number of samples required to maintain a sound routine monitoring program. The routine monitoring program does meet all recognized regulatory requirements.

Texas City/DMEH/MFIC agreed to enter results as less than the limit of detection (<LOD) rather than use zero. It was also agreed to increase monitoring for asbestos, silica, welding fumes, ventilation systems, iodine, isobutylene, lactonitrile, and oxo alcohols. The last three substances need improved analytical methods. ACAM data will be entered into MEHI in a limited fashion as area or source monitoring. Noise dosimetry work has been left at a high level for 1983 to provide enough personal data to be confident that the worker population requiring annual attention in the hearing conservation program is accurately determined. Starting in 1984, personal noise monitoring will be reduced by about 50% in all areas where exposures are well documented and believed to be reasonably accurate.

MEN

J.L. → Henshaw / Peck Wants more Validation
Samples (validate for all styrene & AN chemicals)

LAM023325

Dan, Bob and Ray, I appreciate the cooperation you all extended me on my recent-visit. I think we have agreed on a routine monitoring program which will effectively recognize health concerns and which will maximize the chances for redirecting plant resources to needed areas such as the laboratory (AIHA accreditation means more work) and method development, hearing conservation, training in general, respiratory protection, and perhaps others. Thanks again for your help.

Check the monitoring program closely. If there are questions, let's talk about them.



S. D. Paul

SDP:sml

MAP 001450

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