

FROM E. BROOKS PARKER
ROCKDALE WORKS

TO MR. T. B. BONNEY
PITTSBURGH OFFICE

1982 December 22 . .

RE: INDUSTRIAL HYGIENE AUDIT
ROCKDALE WORKS
1983 JANUARY 18-20

Attached is a package of material containing:

- Completed Plant Audit Evaluation worksheets
- Works organization charts
- Membership lists for the Plant Safety and Health Steering Committee and the Plant Hazardous Materials Control Committee
- A block diagram flow chart for the plant
- A tentative schedule for conducting the audit
- Plant map

After you've had an opportunity to look over the schedule, please get in touch with me so any changes you feel are necessary can be made early in January.

If you need any more information, please let me know.

Brooks

E. BROOKS PARKER

EBP/mz

Attachments

cc:

W. J. Drake
G. H. Lantz
A. G. Clayton
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ARD 003590



INDUSTRIAL HYGIENE
PLANT AUDIT
EVALUATION WORKSHEETS

Rockdale
(LOCATION)

THESE WORKSHEETS SHOULD BE COMPLETED BY THE PLANT INDUSTRIAL HYGIENIST (OR PERSON RESPONSIBLE FOR I.H.) WELL IN ADVANCE OF THE PLANT VISIT -- AND RETURNED TO THE LEADER OF THE AUDIT TEAM.

THE WORKSHEETS HAVE TWO OBJECTIVES:

1. TO ASSIST THE AUDIT TEAM IN PLANNING THE SITE VISIT.
2. TO PROVIDE THE PLANT WITH SOME IDEA OF THE SCOPE AND CONTENT OF THE AUDIT AND FORM A BASIS FOR DISCUSSIONS DURING THE AUDIT.

THE PLANT INDUSTRIAL HYGIENIST (OR PERSON RESPONSIBLE FOR I.H.) IS EXPECTED TO SERVE AS A MEMBER OF THE AUDIT TEAM. THE AUDIT TEAM WILL EXPLORE HIS/HER FUNCTIONS, AS WELL AS ASSESS THE SUPPORT THEY RECEIVE IN CONDUCTING AN EFFECTIVE I.H. PROGRAM.

THE QUESTIONS IN THESE WORKSHEETS ARE NOT MEANT TO BE ALL-INCLUSIVE; RATHER, THEY SERVE AS A STARTING PLACE FOR DISCUSSIONS DURING THE PLANT VISIT.

1982-12-15
(DATE)

KEY ELEMENTS
IN
PLANT I.H. PROGRAMS

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1. POLICIES AND PROCEDURES

The foundation for effective health protection management starts at the top... with the Location Manager and his or her staff. Section 1 will explore the plant management's commitment to meeting the objectives of Industrial Hygiene.

- ° What is the Location Manager's role?
- ° Where and how are he and his staff involved?
- ° What policies and procedures have been established?
- ° What are the mechanisms for continuity of managing employee health protection?

The effectiveness of any I.H. Program will be highly dependent upon the role of plant management. The following types of questions are a starting place to evaluate plant management's position.

	<u>YES</u>	<u>NO</u>
1. <u>POLICIES AND PROCEDURES</u>		
1.1 - Has an I.H. written policy been:		
Adopted?	<u>X</u>	<u> </u>
Published?	<u>X</u>	<u> </u>
Supplied in Orientation Literature?	<u> </u>	<u>X</u>
1.2 - Does the Location Manager participate (at least annually) in an I.H. tour of the facility?		
	<u> </u>	<u>X</u>
1.3 - Are potential health hazard problems discussed in Location Manager's staff meetings?		
	<u>X</u>	<u> </u>
Often <u> </u>		
Sometimes <u>X</u>		
Don't Know <u> </u>		
Rarely <u> </u>		
Never <u> </u>		
1.4 - Is there a Joint Health & Safety Committee (Labor and Management)?		
	<u>X</u>	<u> </u>
1.5 - Is I.H. represented as a member of the Joint Health & Safety Committee?		
	<u>X</u>	<u> </u>
1.6 - Are potential health hazards discussed?		
	<u>X</u>	<u> </u>
Often <u>X</u>		
Sometimes <u> </u>		
Rarely <u> </u>		
Never <u> </u>		
Don't Know <u> </u>		
1.7 - Are results of personal exposure surveys provided to employees?		
	<u>X</u>	<u> </u>
Always <u>X</u>		
Sometimes <u> </u>		
Never <u> </u>		

2. ORGANIZATION AND STAFFING

Discussion in this area is intended to determine if the I.H. organization and staffing are appropriate for the specific needs of the plant. Where I.H. responsibilities are divided, more detail as to the manner of this division will be sought.

It is essential that those carrying out I.H. responsibilities be adequately trained. The Audit Team will not be looking for depth of training, per se, received by the hygienist and technician; rather, it will be matching the training received by the principals with the complexity and number of health problems at the specific plant location.

There will be a considerable amount of discussion centered around the day-to-day activities of the I.H. Supervisor, who he deals with, and how he attains his objectives, through his own efforts and through cooperative ventures with other managers. The Audit Team will explore this area through discussion with the I.H. Supervisor and other appropriate managers throughout the plant.

2. ORGANIZATION AND STAFFING

- | | <u>YES</u> | <u>NO</u> |
|---|--|------------------------|
| 2.1 - Does one individual have the clearly defined responsibility and accountability for I.H. activities? | <u> </u> | <u> X </u> |
| 2.2 - What are the I.H. Supervisor's qualifications? | <u>SHARABLE BETWEEN ENV. SAFETY CH. CHEM</u> | |
| Professional Industrial Hygienist | <u> </u> | <u> X </u> |
| Scientist or engineer, with some I.H. training | <u> X </u> | <u> </u> |
| (Describe the type and source of training.) | <u>OJT, SEMINARS, PERSONAL STUDY</u> | |
| Primarily administrative | <u> X </u> | <u> </u> |
| Other | <u> </u> | <u> </u> |
| 2.3 - Are there plans for providing the I.H. Supervisor with basic or supplementary training? | <u> X </u> | <u> </u> |
| (If so, describe.) | <u>ASSE PROF DEV. CONF</u>
<u>CORPORATE SEMINARS</u> | |
| 2.4 - Is I.H. Supervisor certified by ABIH? | <u> </u> | <u> X </u> |
| 2.5 - Is I.H. Supervisor a member of AIHA? | <u> X </u> | <u> CH. CHEMIST </u> |
| 2.6 - Does I.H. Supervisor periodically attend professional meetings? | <u> X </u> | <u> </u> |
| National | <u> </u> | <u> </u> |
| Local | <u> X </u> | <u> </u> |
| Corporate-sponsored conferences | <u> X </u> | <u> </u> |
| 2.7 - Does the I.H. Supervisor have technician support? | <u> X </u> | <u> </u> |
| 2.7.1 - Has the technician received training in I.H. monitoring and measuring? | <u> X </u> | <u> </u> |
| (If so, describe the type and source of training.) | <u>AIHA 2 DAY SEMINAR</u>
<u>TSA ANNUAL CONF. (TECH. SESSIONS)</u>
<u>CERTIFIED OCC. HEALTH CONSULTANT</u> | |
| 2.7.2 - Are there plans for basic or supplementary training? | <u> X </u> | <u> </u> |
| (If so, describe.) | <u>NIOSH TRAINING PROGRAM</u>
<u>CORPORATE PROGRAMS</u> | |

2. ORGANIZATION AND STAFFING (Cont.)

YES

NO

2.8 - Does the I.H. Supervisor have adequate time to devote to I.H.?

X

2.8.1 - What percent of his time is devoted to I.H.?

10-20%

2.9 - Does the I.H. Supervisor have direct access to all levels of plant management?

X

2.9.1 - Is this access frequently used?

X

2.10- What is the I.H. Supervisor's perception of the visibility of I.H. in his plant within the organizational structure?

More than adequate

Adequate

X

Less than adequate

3. I.H. FACILITIES AND EQUIPMENT

An effective I.H. effort requires adequate facilities, sampling and measuring equipment, and laboratory analytical support. There should be sufficient office space and I.H. laboratory space for maintenance of sampling equipment. Methods and frequency of equipment calibration will be discussed. Plant or other laboratory analytical chemistry support will be reviewed.

Decisions in I.H. matters are usually based upon or supported by sampling and analytical data. In Section 3, the Audit Team will assess the plant's I.H. and laboratory capabilities for assuring development of accurate, reliable, and credible data for sampling and chemical analysis.

3. I.H. FACILITIES AND EQUIPMENT

YES

NO

3.1 - Is adequate I.H. work space available:

Office? X

Storage? X

Laboratory? X

3.2 - Is the I.H. equipment inventory adequate to support program objectives? X

3.2.1 - Is equipment routinely calibrated and maintained?
(Comment on frequency and procedures for calibration.)

X
FREQ. AS REQ'D BY WORKLOAD.

BEFORE EACH USE; CHECKED DURING AND

3.3. - Are I.H. samples analyzed at: *IMMEDIATELY AFTER USE.*

Plant Laboratory (In-House) X

YES

ALCOA'S EHL (ATC) X

YES

Outside Laboratory (Independent) NO

3.3.1 - Are collected I.H. samples refrigerated or otherwise properly stored and protected prior to analysis? X

3.3.2 - If plant laboratory is utilized for analysis of I.H. samples, does the laboratory have the necessary:

Physical Facilities for Trace Analysis? X

Instruments and Equipment? X

Trained Chemists and Technicians? X

3.4 - Is there a documented analytical quality assurance program, and are quality control records properly maintained for all in-house analyses? X

3.5 - Are approved analytical methods used for analyses? X

ALCOA's EHL X

NIOSH X

ASTM

Other

3.6 - If outside Laboratory is utilized for analysis of I.H. samples, is the laboratory AIHA accredited?
(Comment on reason for outside laboratory analyses.)

N/A.

4. WRITTEN I.H. PROGRAM

It is essential that each plant has a written program even if, in the case of the smaller plants, it entails only a page or two of written material. One of the more important reasons for having a written program is to enable the hygienist to manage his job... rather than have his job manage him. Without the guidelines provided by a written program, the hygienist will tend to operate in a "fire fighting" mode. Furthermore, a program in writing will assist the plant in maintaining a program that is both consistent and appropriate, especially in the event of personnel changes.

The Audit Team will explore in detail the contents of each facet of the I.H. Program. The primary thrust is to determine the adequacy of the written material for the specific plant needs.

4. WRITTEN I.H. PROGRAM

4.1 - Overall Program

4.1.1 - Are the contents of the plant's overall I.H. Program put into writing?

YES

NO

X

4.1.2 - If so, does this document include a statement of policy and objectives?

X

4.1.3 - A description of processes?

X

BY
REFERENCE

4.1.4 - An inventory of potential exposures?
Including process materials?

X

X

By-Products?

X

Physical Hazards (Noise, Radiation, Etc.)?

X

4.1.5 - A list of job classifications?
Including list of tasks each performs?

X

X

Potential environmental exposures for each?

X

X

4.1.6 - A record of hazardous materials training?

X

MAINTAINED IN
DEPT SAFETY MTC
RECORDS

4.1.7 - A sampling schedule?

X

4.2 - Respirator Program

4.2.1 - Is respiratory protection used in any area of the plant?

X

4.2.2 - If so, does a written program exist?

X

4.2.3 - Is respiratory protection mandatory where engineering controls are being instituted, or are not feasible, to control air contaminants to acceptable levels?

X

4.2.4 - Is there a written Respiratory Protection Program which aims to fulfill the requirements of 29 CFR 1910.134?

X

4.2.5 - Is the responsibility for program administration clearly defined?

X

4. WRITTEN I.H. PROGRAM (Cont.)

4.2 - Respirator Program (Cont.)

YES

NO

4.2.6 - Do written Standard Operating Procedures detailing selection and use of respirators exist?

X

4.2.7 - Do SOP include a list of all jobs requiring respirator usage?

X

4.2.8 - Is there a fit-testing program? (Describe type.)

X

3M FT 10 QUALITATIVE
FIT TEST EQUIPMENT
IS USED.

4.2.9 - Are respirators adequately cleaned and maintained, and are they inspected during cleaning?

DISPOSABLE RESP.
USED.

N/A

4.2.10- Do respirator users receive medical approval, and is such approval documented — and reviewed periodically?

X

4.2.11- Are all respirators NIOSH/MSHA approved and adequate for intended use?

X

4.2.12- Is program periodically evaluated to insure proper respirator use and continued effectiveness of program?

X

4.3 - Hearing Conservation Program

4.3.1 - Are any employees exposed to noise levels equivalent to 85 dBA or higher for an 8-hr. exposure?

X

4.3.2 - If so, does a Hearing Conservation Program exist?

X

4.3.3 - If Hearing Conservation Program exists, is it in writing?

X

4.3.4 - Are hearing protectors mandatory where excessive exposures exist?

X

4.3.5 - Is there enforcement of required hearing protection?

X

4.3.6 - Are signs requiring hearing protection posted in areas requiring mandatory hearing protection?

X

4. WRITTEN I.H. PROGRAM

4.4 - Other Programs

YES

NO

4.4.1 - Are there needs for other
I.H. sub-programs in your
plant (e.g., Urinary Fluoride,
Ionizing Radiation, etc.)?

X

4.4.2 - If so, name them:

URINARY FLUORIDE SURVEY
RADIATION BADGE PROGRAM
ATOMIZER + MEDICAL XRAY

4.4.3 - Are they in written form?

X

4.4.4 - Are they a part of the overall
plant I.H. Program?

X

5. ENVIRONMENTAL MONITORING & SURVEILLANCE

The foundation for evaluating potential I.H. problems is accurate environmental monitoring data. Through I.H. sampling, air contaminants are identified; the effectiveness of engineering controls are measured; and the magnitude of employee exposures are determined.

The principal objective of this section is to determine if monitoring is being conducted correctly, baseline exposures are established, and a monitoring program is developed for continued surveillance.

Special I.H. problems will be reviewed concerning the types of hazardous contaminants existing and the job classes exposed to these compounds.

5. ENVIRONMENTAL MONITORING & SURVEILLANCE

YES

NO

5.1 - Air Sampling for Chemical Contaminants

5.1.1 - List contaminants of major health concerns and comment upon exposure levels.

<u>FLUORIDES</u>	<u>GEN. < PEL</u>
<u>DUST</u>	<u>GEN. < PEL</u>
<u>PPOM</u>	<u>GEN. < PEL</u>
<u>ASBESTOS</u>	<u>< PEL</u>
<u>CL₂ & HCL</u>	<u>< PEL</u>
<u>SILICA</u>	<u>GEN. < PEL</u>

5.1.2 - What is the basis for sampling?

Scheduled

Complaint X

Regulation X

5.1.3 - Is the sampling schedule maintained? N.A.

5.1.4 - Have baselines been established for all job classes where exposures to hazardous contaminants exist?

X

5.1.5 - Are Sampling Data Sheets complete?

X

5.1.6 - Is parallel sampling performed during OSHA, MSHA inspections?

X

5.1.7 - Are blanks and bulks, when required, sent with samples for analysis?

X

5.1.8 - Has an adequate amount of sampling been conducted for evaluating I.H. concerns?

X

5.1.9 - Are there any areas needing more data?

X

OIL MIST - PROPEAZI
CL₂ - INGOT PLANT
NOISE - VEHICLES

5. ENVIRONMENTAL MONITORING & SURVEILLANCE (Cont.)

5.2 - Noise Monitoring & Surveillance

YES

NO

5.2.1 - Has a total plant noise survey
been completed?

X

Personal

Area

Both X

5.2.2 - How often is it updated?

AS REQUIRED

5.2.3 - Are noise measurements repeated
in areas when process changes
have occurred?

X

5.2.4 - Are calibrations made before
and after measurements?

X

5.3 - Radiation Monitoring & Surveillance (As Appropriate)

5.3.1- Are radiation devices (ionizing
and non-ionizing) used at this
plant?
(If not, proceed to Section 5.4.)

X

Microwave

Density & Level Gauges

Medical X-Ray X

Others X ATOMIZER

5.3.2- Is radiation monitoring
routinely conducted?

X

5.3.3- Who conducts radiation monitoring?

Hygienist

Engineering

Other X MEDICAL DEPT.

5.3.4- Are radiation supervisors
adequately trained?

X

5.3.5- Type of monitoring equipment available?

Beta/Gamma Survey Meter

Electro-magnetic Leakage Monitor

RADIATION BADGES X

5. ENVIRONMENTAL MONITORING & SURVEILLANCE (Cont.)

5.3 - Radiation Monitoring & Surveillance (As Appropriate) (Cont.)

	<u>YES</u>	<u>NO</u>
5.3.6 - Is there a current inventory of all ionizing and non-ionizing radiation sources?	<u>X</u>	<u> </u>
5.3.7 - Is a radiation badge program in place?	<u>X</u>	<u> </u>
5.3.8 - Is I.H. included in the approval cycle for all radiation source procurement?	<u>X</u>	<u> </u>
5.3.9 - Are all radiation sources labeled?	<u>X</u>	<u> </u>
5.3.10- Who maintains the radiation records file? ENV. SUPT. + MEDICAL		
5.3.11- Are radiation records complete?	<u>X</u>	<u> </u>

5.4 - Heat Stress (As Appropriate)

5.4.1 - Are heat stress studies conducted?	<u>X</u>	<u> </u>
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6. RECORDKEEPING

An effective I.H. Program must have a well-managed system of recordkeeping. This will help provide:

- a. Protection of workers' health by providing easily retrievable data on I.H. exposures.
- b. Protection of the Company's interests by documenting levels below the PEL.
- c. Procedures to meet legal requirements of recordkeeping.

This section will determine whether records are stored in a manner in which they can be easily retrieved, and if the records are complete. Specific files related to I.H. monitoring will be considered and, where appropriate, the techniques involved in handling computerized data will also be discussed.

6. RECORDKEEPING

	<u>YES</u>	<u>NO</u>
6.1 - Is a file maintained for personal exposures?	<u>X</u>	<u> </u>
By individual <u>X</u>	<u> </u>	<u> </u>
By job class <u>X</u>	<u> </u>	<u> </u>
6.2 - Are calibration records maintained for sampling equipment?	<u>X</u>	<u> </u>
6.3 - Are repair/maintenance records maintained for sampling equipment?	<u>X</u>	<u> </u>
6.4 - Are Sampling Data Sheets filed with survey results?	<u>X</u>	<u> </u>
6.5 - Is a computerized recordkeeping system employed?	<u> </u>	<u>X</u>
6.6 - Other files maintained:	ISSUANCE	USE
Issuance of hearing protection & use?	<u>X</u>	<u>X</u>
Mandatory <u>X</u>		
By choice <u>X</u>		
Assignment & approval for respirator use?	<u> </u>	<u>X</u>
Respirator fit-testing?	<u>X</u>	<u> </u>
Audiometer Booth Calibration?	<u>X</u>	<u> </u>
Inventory of Hazardous Materials?	<u>X</u>	<u> </u>
Material Safety Data Sheets:	<u>X</u>	<u> </u>
Company	<u>X</u>	<u> </u>
Supplier	<u>X</u>	<u> </u>
OSHA/MSHA Inspections & Citations?	<u>X</u>	<u> </u>
Employee Health Hazard Training?	<u>X</u>	<u> </u>

MAINTAINED
IN DEPT.
SAFETY MTG. RECORDS

7. HEALTH HAZARD CONTROLS

Once health hazards are identified and the degree of hazard determined, the next question to be answered is... What should be done to alleviate or control the problem?

The proper sequence in seeking solutions is:

- ° Substitution
- ° Administrative Controls
- ° Engineering Controls
- ° Personal Protection

In this section, the Audit Team will assess the plant's approach and degree of success in solving exposure problems.

7. HEALTH HAZARD CONTROLS

7.1 - Are health hazard controls instituted when:

YES

NO

Exposures are known to exceed standards?

X

Exposures are unknown and judged to approach or exceed standards?

X

Health effects or discomfort are noticed at exposure levels below standards?

X

7.2 - Are safer substitute materials, engineering controls, and work practice controls being given priority consideration?
(List examples.)

X

ASBESTOS REINFORCEMENT
ANGLE MIXER WORK PRACTICES
AND ENGINE CONTROLS
ROLLING PUMP NOISE CONTROLS

7.3 - Are ventilation and exhaust systems inspected at installation and periodically for their effectiveness?

X

7.3.1 - By whom?

POTENTIAL VENT SYS. - PROC. ENGINEER

7.3.2 - Are new or modified ventilation systems reviewed by I.H.?

X

8. HEALTH HAZARD TRAINING

Educating hourly employees, supervisors, and . . .
plant management is an important element of a
successful I.H. Program. This Audit will
explore a variety of aspects of health hazard
training including, but not limited to:

- Who does it?
- How is it accomplished?
- Frequency and time spent?
- Program content (previous and planned)?
- ◦ Attendance records?

8. HEALTH HAZARD TRAINING

YES

NO

8.1 - Are there health hazard training programs provided for employees in the following areas:

<u>PROGRAM</u>	<u>INITIAL</u>	<u>REFRESHER</u>
Hearing Protection	<u>X</u>	<u>X</u>
Heat Stress	<u>X</u>	<u>X</u>
Radiation	<u>X</u>	<u> </u>
Respiratory Protection	<u>X</u>	<u>X</u>
Toxic Materials	<u>X</u>	<u>X</u>

8.2 - Does training include both hourly and salaried personnel?

X

8.3 - Do line supervisors receive training equivalent to that indicated above?

X

ARD 003613

9. COMMUNICATIONS AND COORDINATION

The overall success of a plant I.H. Program is dependent upon close working relationships and communications between many departments within the plant and I.H. personnel.

The purpose of this section will be to explore the scope and effectiveness of the communication between I.H. and these various critical departments.

Intercommunication will be evaluated as relates to the ability to identify mutual potential I.H. concerns, as well as to achieve implementation of I.H. corrective actions where a joint effort is required. The nature of the communication (formal, informal, etc.) will also be pursued.

9. COMMUNICATIONS AND COORDINATION

	<u>YES</u>	<u>NO</u>
9.1 - <u>Medical</u>		
9.1.1 - Is biological monitoring and medical surveillance for toxic substances being performed, where appropriate?	<u>X</u>	<u> </u>
9.1.2 - Does the I.H. Supervisor interpret the results before informing the employee?	<u>X</u>	<u> </u>
9.1.3 - Do the I.H. Supervisor and the physician discuss the results of the tests?	<u>X</u>	<u> </u>
9.1.4 - Are survey results reported to department supervisory or management personnel?	<u>X</u>	<u> </u>
9.1.5 - Are survey results reported to Pittsburgh Industrial Hygienist liaison contact?	<u>X</u>	<u> </u>
9.1.6 - Does the physician participate in employee training programs?	<u>X</u>	<u> </u>
9.1.7 - Is there effective liaison between Medical and I.H. as relates to potential chemical exposures?	<u>X</u>	<u> </u>

9.2 - Safety

9.2.1 - Is I.H. involved in Safety departmental meetings and activities within the plant?	<u>X</u>	<u> </u>
9.2.2 - Is there effective communication, where necessary, between I.H. and Safety as relates to plant exposure problems (noise, respirators, etc.) and their resolution?	<u>X</u>	<u> </u>
9.2.3- Are I.H. concerns considered in plant Project Safety reviews? (Discuss how this is accomplished.)	<u>X</u>	<u> </u>

ARD 003615

A-COPY OF EVERY R/I OR REQUEST FOR SHOP CARDER IS SENT TO ENV. SUPT. WHO FOLLOWS UP ON THOSE WHICH MIGHT INVOLVE I.H. IN ADDITION, SAFETY REPRESENTATIVE AT FORMAL REVIEWS WILL CONTACT ENV. SUPT.

9. COMMUNICATIONS AND COORDINATION (Cont.)

9.2 - Safety (Cont.)

YES

NO

9.2.4 - Do JSAs include health risks?

X

9.2.5 - Have I.H. and Safety developed emergency planning for high-hazard, critical events?

X

9.3 - Line Production

9.3.1 - Is there effective communication between I.H. and Line Production on I.H. matters and concerns?

X

9.3.2 - Is the I.H. Supervisor recognized as a resource by the Line Production personnel?

X

9.3.3 - Is there effective implementation of I.H. recommendations by Line Production?

X

9.4 - Is there effective communication between the I.H. Supervisor and the following groups:

Environmental Control?

X

Engineering & Maintenance?

X

Procurement?

X

Hearing Conservation Coordinator (If other than I.H.)?

Works Laboratory Personnel (If they perform services for I.H.)?

X

Plant Management?

X

9.5 - Do the Corporate I.H. and Environmental Health Lab personnel provide the services you desire?

X

ARD 003616

10. CHEMICAL CONTROL

Plants purchase and maintain a wide inventory of chemical materials. Pro-active, preventive measures to avoid potentially hazardous exposures start with a knowledge of their existence within the plant. Management of chemicals may start with a continuously updated inventory and/or include such aspects as Material Safety Data Sheets or adequately labeled containers. Depending upon the degree of chemical material use, some plants will have a Hazardous Materials Control Committee.

The Audit Team will explore all aspects of the plant's efforts to manage and control chemical materials.

10. CHEMICAL CONTROL

	<u>YES</u>	<u>NO</u>
10.1 - Is there a plantwide materials inventory of chemicals?	<u>X</u>	<u> </u>
10.1.1 - Are there procedures for updating the inventory?	<u>..</u>	<u>X?</u>
10.2 - Is there a Hazardous Materials Control Committee?	<u>X</u>	<u> </u>
10.3 - Does Procurement obtain I.H. clearance prior to introducing new chemical substances into the worksite?	<u>X</u>	<u> </u>
10.4 - Are MSDS available and transmitted to I.H. personnel for all production chemical substances purchased in the workplace?	<u>X</u>	<u> </u>

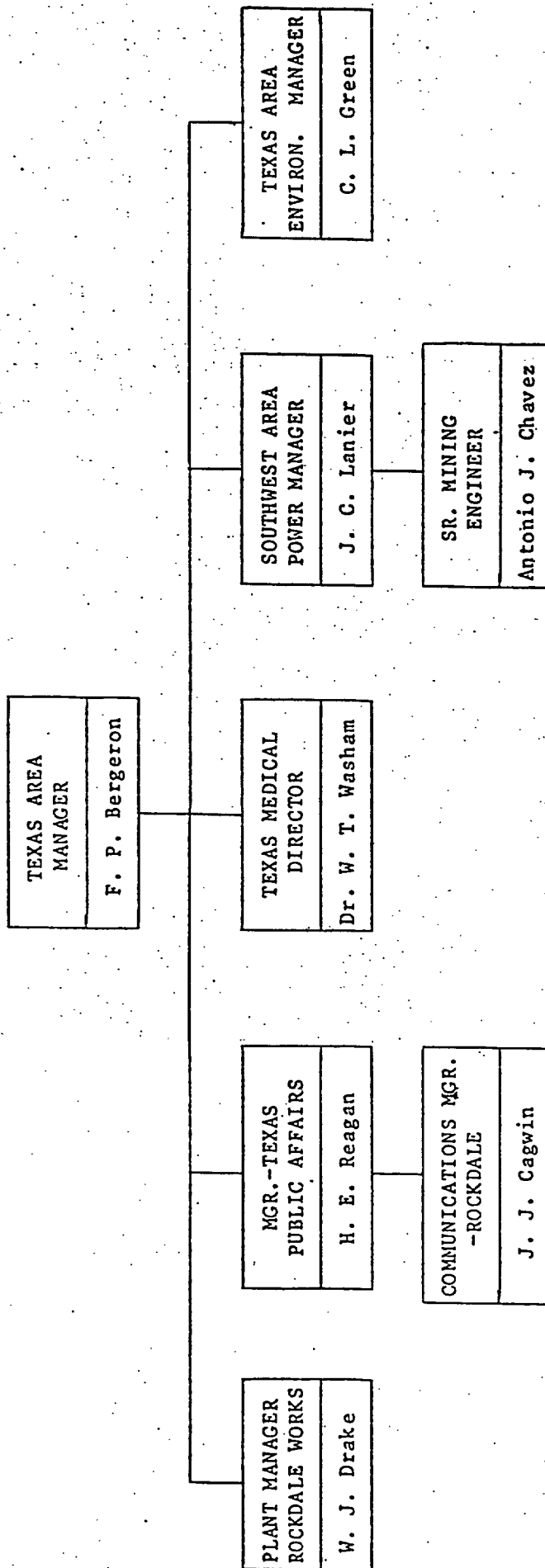
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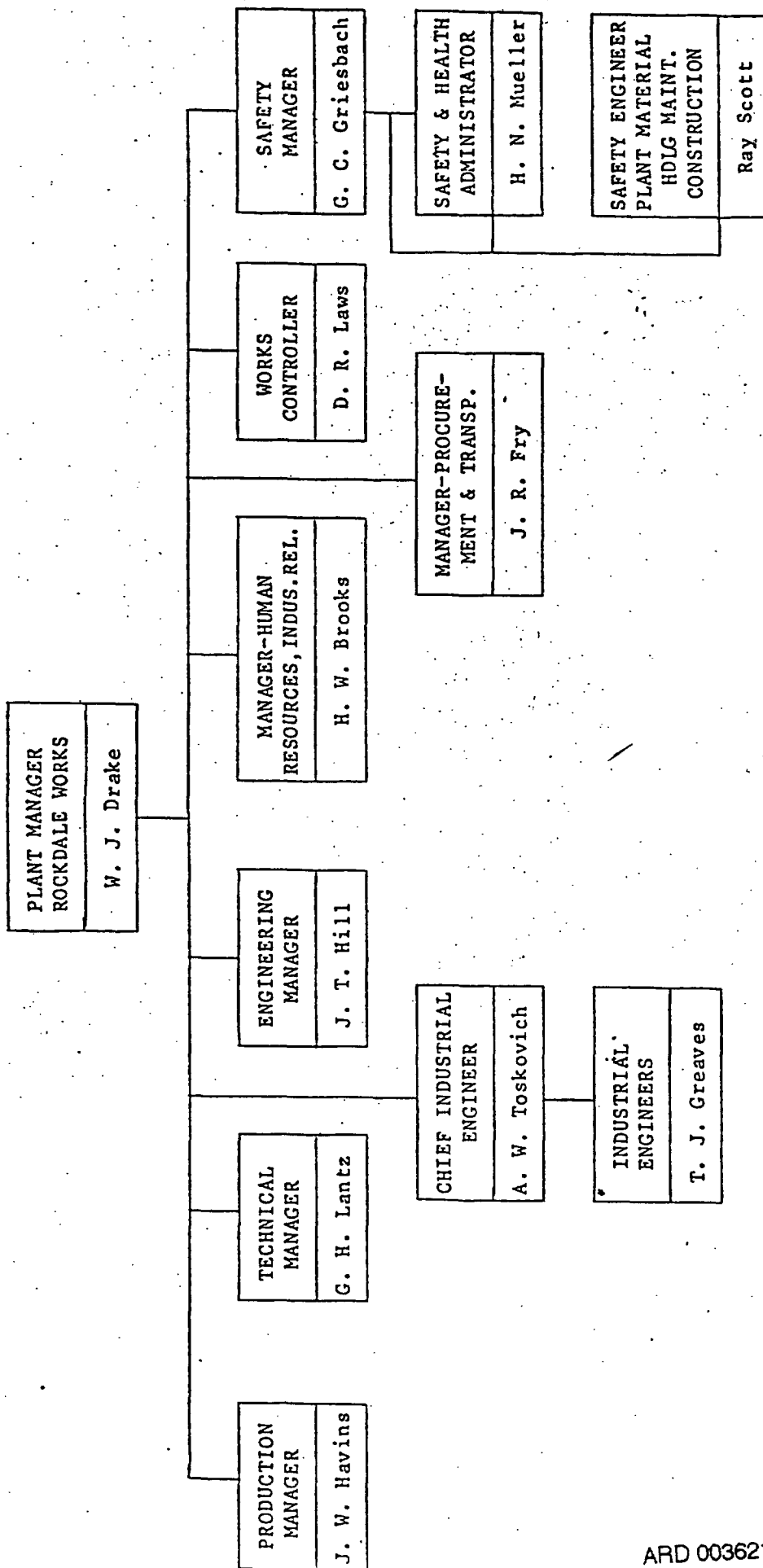
ROCKDALE WORKS ORGANIZATION CHARTS

1982 October 01

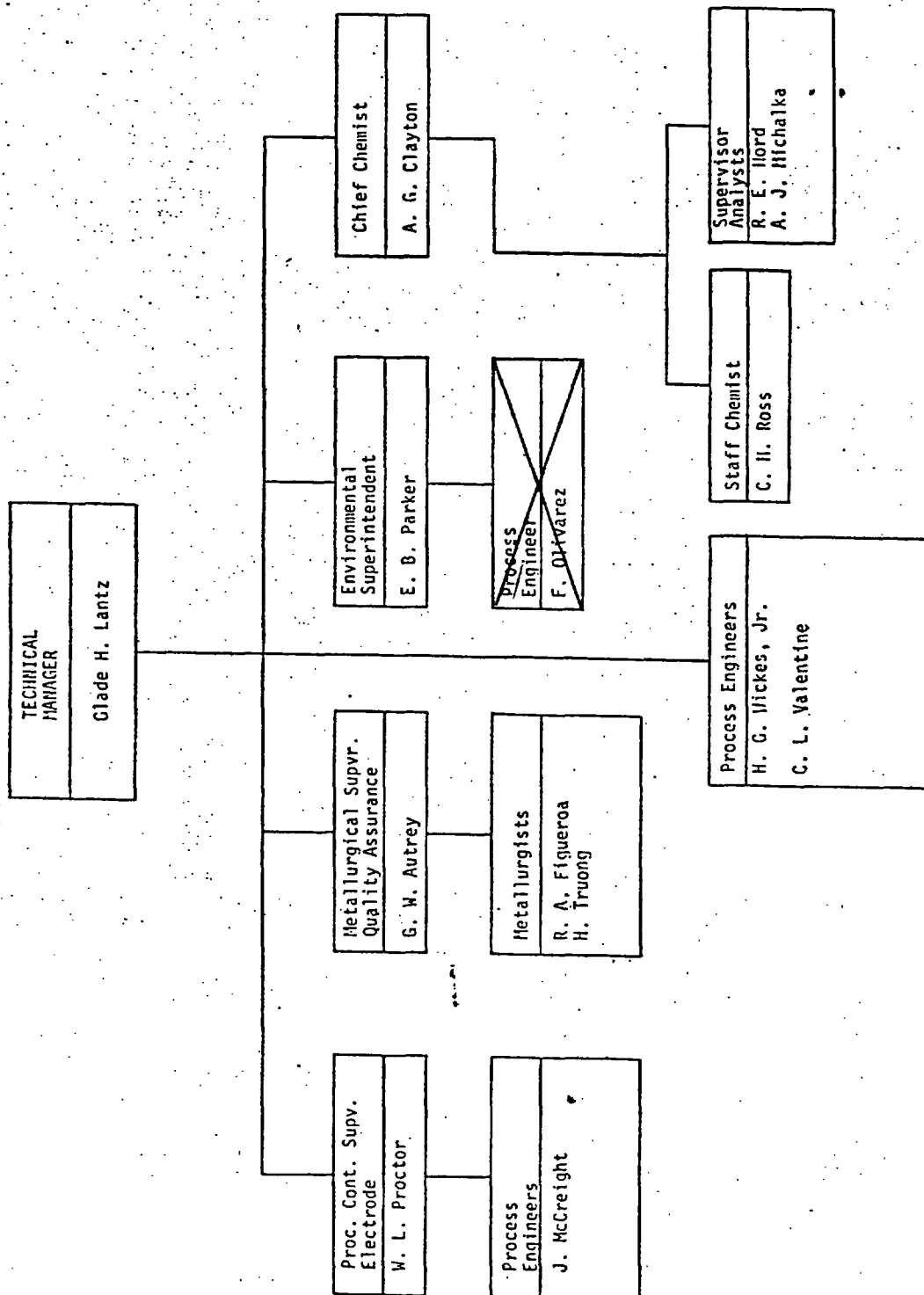
Sheet Nos.

Texas Area Manager.....	1
Plant Manager.....	2
Technical Manager.....	3
Production Manager.....	4
Engineering Manager.....	5
Manager - Human Resources, Industrial Relations.....	6
Works Controller.....	7
Manager - Procurement & Transportation.....	8
Potroom Superintendent.....	9
Committee Membership.....	10





ARD 003621



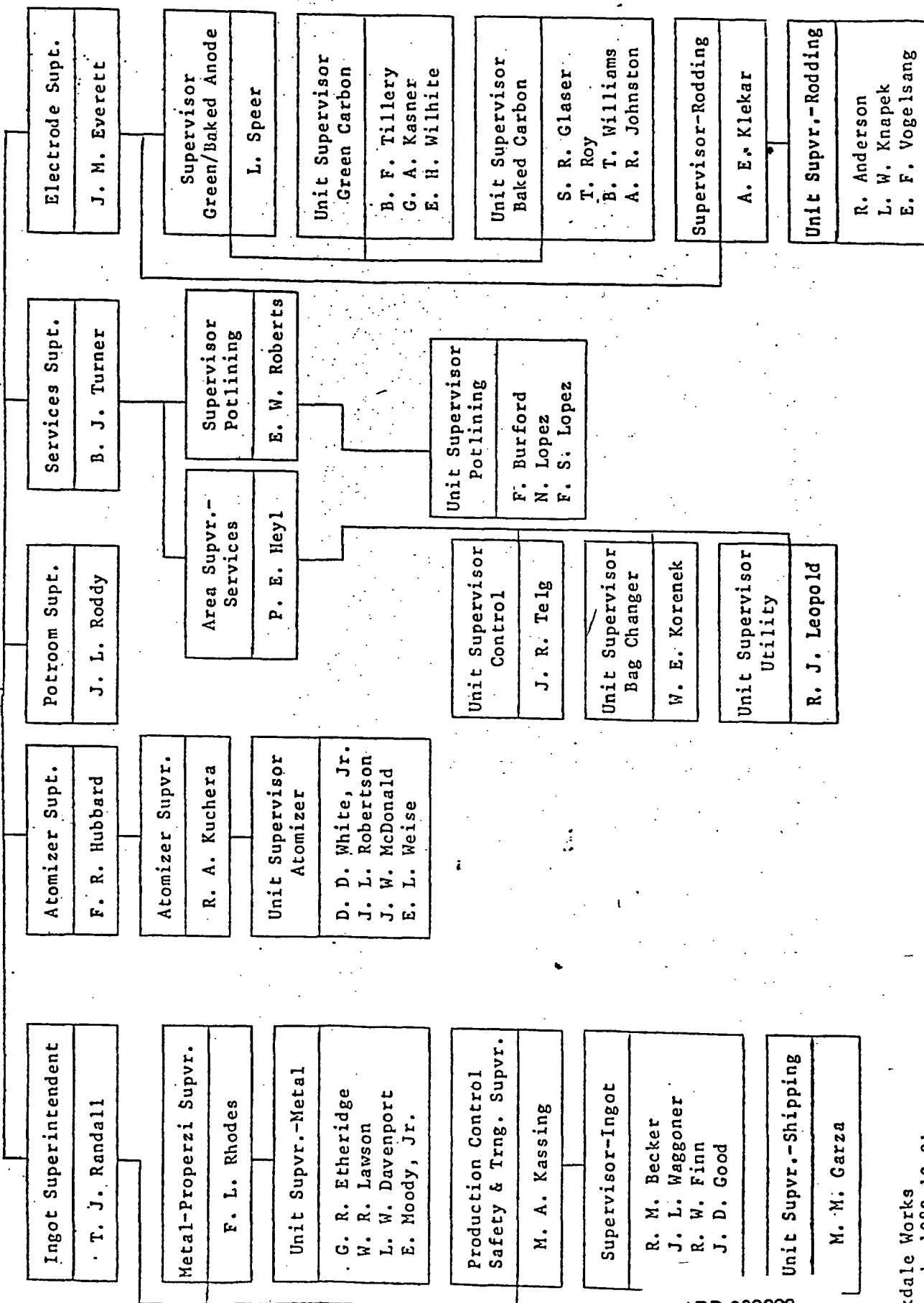
Rockdale Works

Revised: 1982-10-01

Sheet 2

ARD 003822

PRODUCTION MANAGER	
J. W. Havins	



ARD 003823

ENGINEERING MANAGER
J. T. HILL

CONSTRUCTION SUPERINTENDENT
T. J. HORNUTH

WORKS CHIEF MECHANICAL ENGINEER
L. J. CHESNEY

KEVIN ROLAN
L. D. GREEN
F. P. AMISO
LETICIA CAST
K. R. AULICH

DIVISIONAL MECHANICAL ENGINEER
S. J. SPELL

T. E. ALEJANDRO
C. A. HOELSCHER
D. F. JOB
S. J. KNIGHT
J. H. MITCHELL
J. W. HUELLER
T. N. O'KEEFEY

DIVISIONAL MECHANICAL ENGINEER
W. G. JOHNSON

J. D. BAKER
J. L. CHESNUTT
R. L. HARTMAN
E. A. PHILLIPS
A. SANDOVAL
C. H. WILSON

DESIGN SUPERVISOR
C. T. ROSWELL

J. L. DIAMOND
J. B. CRUSENDORF
P. H. HEADRICK
D. R. HIRT
J. W. KIRK
L. W. WEISS
P. J. KOVARIK

WORKS CHIEF ELECTRICAL ENGINEER
R. E. CLARK

DIVISIONAL ELECTRICAL ENGINEER
C. P. KOUBA

G. L. KNIGHTON
L. W. ROZACKY
R. F. THIELEN
K. D. GIVERS

PROCESS CONTROL COMPUTER
J. E. KING

O. T. DANIELS
G. A. GREER
R. A. SMITH
J. T. WILEY
A. L. BRAZ
MILLIE LANDRUM

MAINTENANCE PLAN/SCIL SUPERVISOR
L. G. PARSONS

WORKS MAINTENANCE SUPERINTENDENT
W. T. ECKERT, JR.

MECH. MAINT. SUPVR. NORTH PLANT
S. W. TUCKER

UNIT SUPERVISOR MECH. MAINT.
G. R. HOLIAS
P. C. KURENEK
J. C. LEE
S. E. McFAUL
V. G. POHYKAL
J. D. QUINN
R. G. REMALEY
JOE GREEN

MECH. MAINT. SUPVR. SOUTH PLANT
R. E. COX

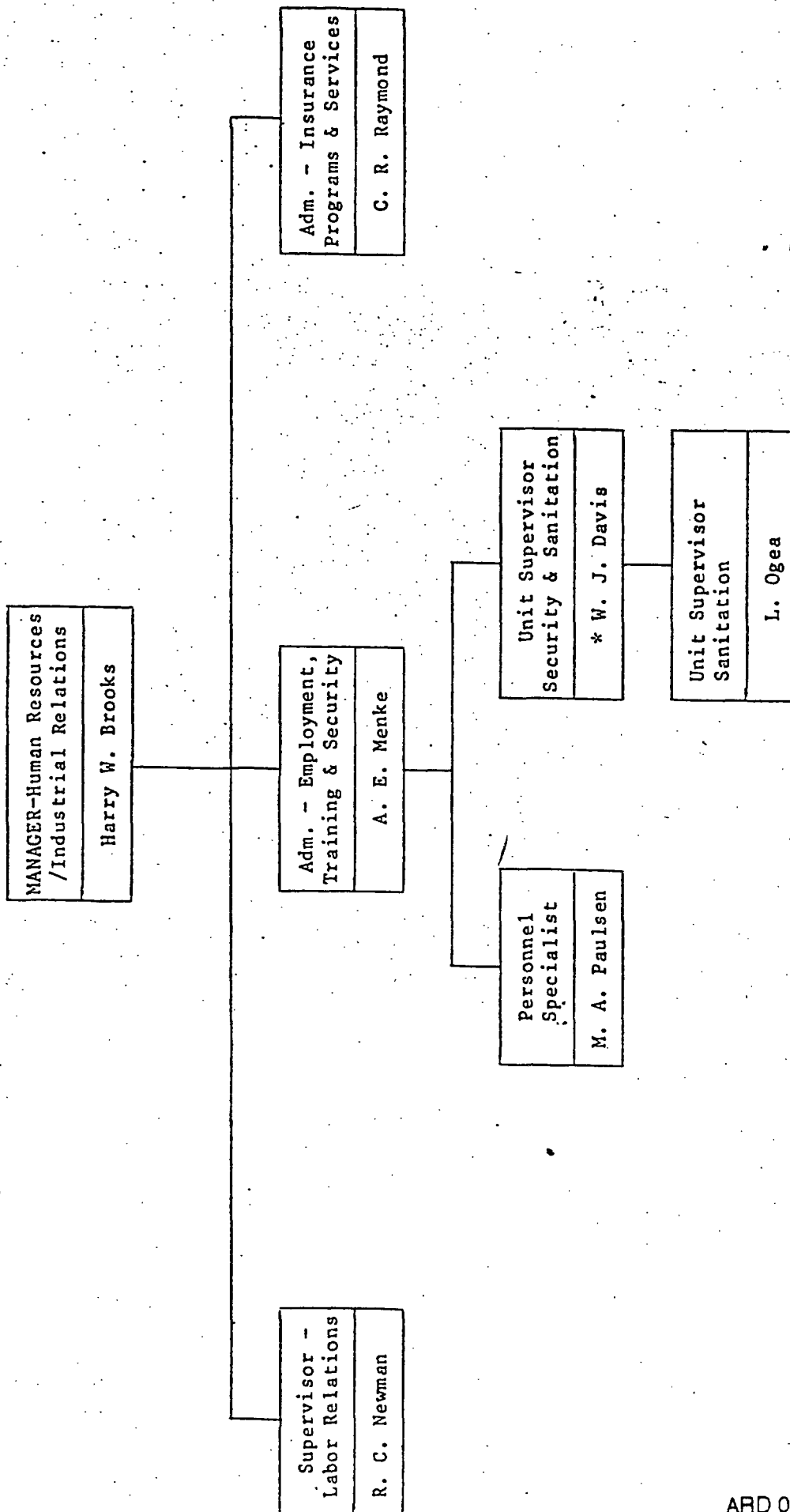
UNIT SUPERVISOR MECH. MAINT.
J. A. CIURCHI
M. J. GRAHAM
J. Z. KRALL
J. D. LEGGETT
J. R. McCLAIN
H. E. RYAN
P. D. STOUGH
J. L. THROCKMORTON
JOE OCHOA

MAINT. TRAINING SUPVR.

PROCESS COMPUTER MAINT. SPECIALIST
T. W. REBRINGER
J. GARZA
R. E. LASKIE
C. R. UNNASCH

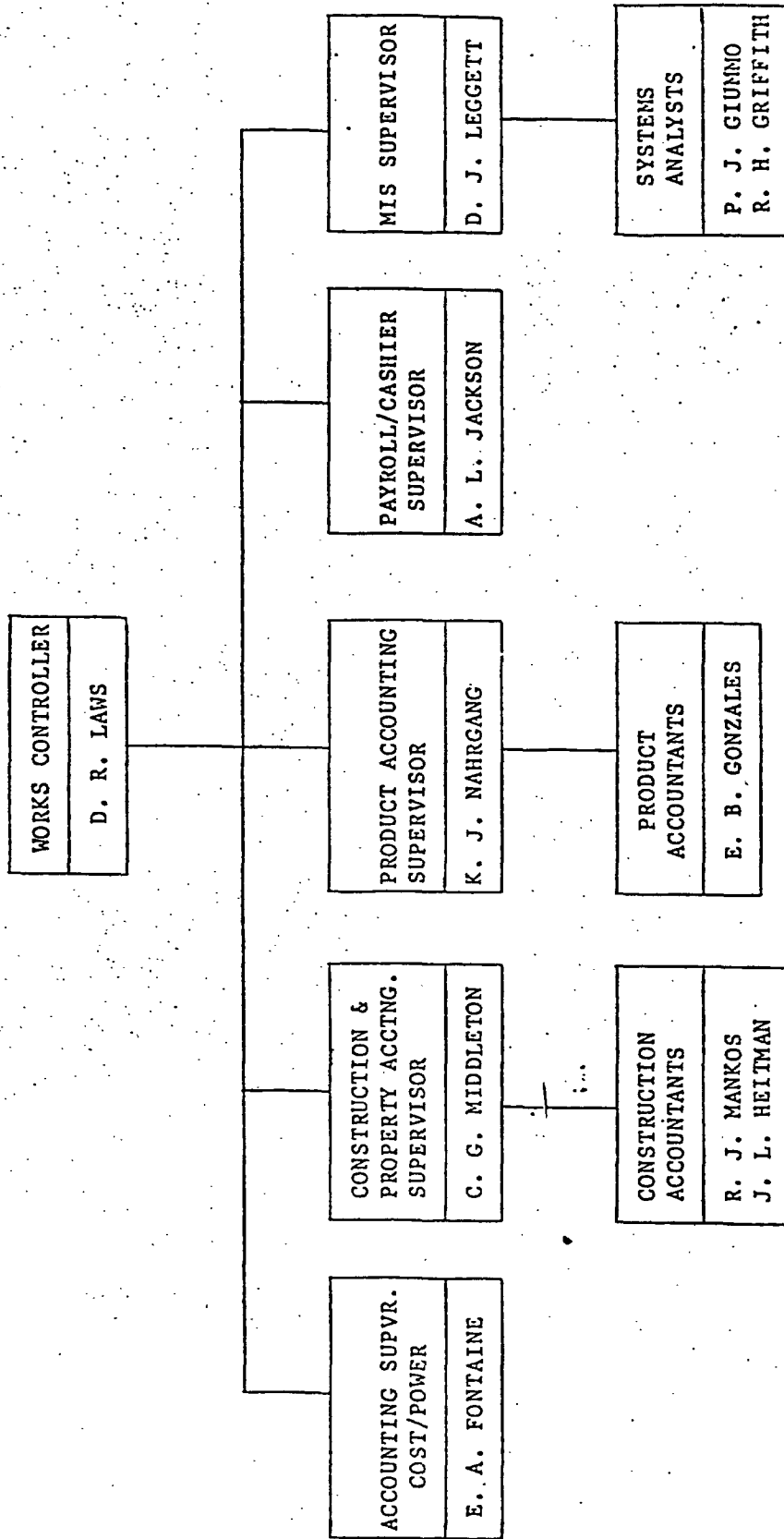
UNIT SUPERVISOR ELECT. MAINTENANCE
A. G. BUZAR
A. L. GLASER
L. HANNETT
R. L. McKEE
D. R. OWERS
E. V. PATSCHKE
N. E. PETERSON
C. J. ROZACKY

ARD 003624

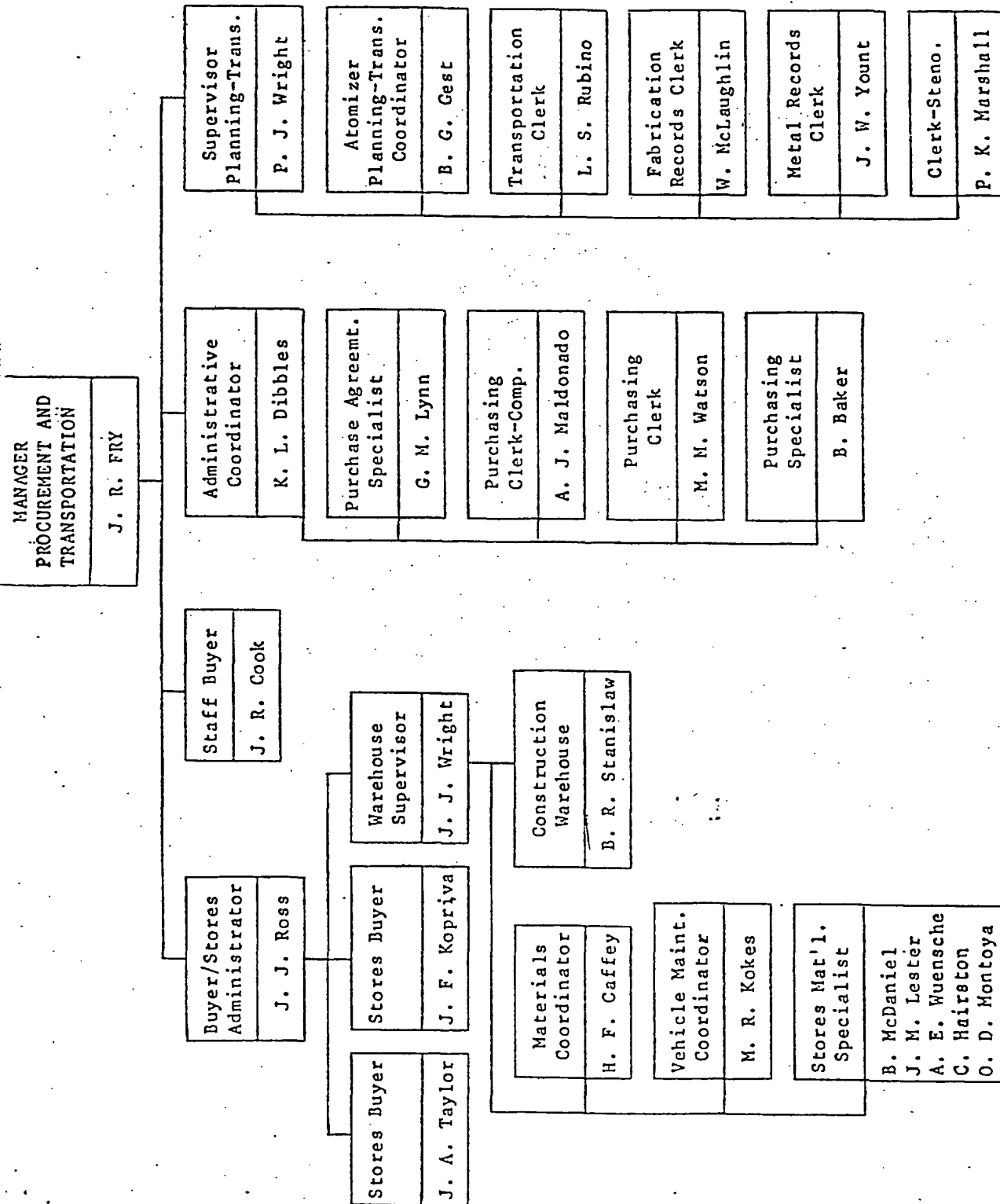


* Reports directly to Manager, Human Resources/Industrial Relations

ARD 003625



Rockdale Works
Revised: 1982-10-14
Sheet 7



POTROOM SUPERINTENDENT
J. L. Roddy

PRODUCTION CONTROL SAFETY AND TRAINING SUPERVISOR LINES 1 & 2
R. C. Gutierrez

PRODUCTION CONTROL SAFETY AND TRAINING SUPERVISOR LINES 3 & 4
J. C. Morgan

PRODUCTION CONTROL SAFETY AND TRAINING SUPERVISOR LINES 5 & 6
P. A. Lowrey

PRODUCTION CONTROL SAFETY AND TRAINING SUPERVISOR LINES 7 & 8
R. W. Nock

POT BAKING SUPERVISOR
D. E. Kiesling R. J. Grossman

SHIFT SUPVR. CREW 1
B. Johnson

SHIFT SUPVR. CREW 2
C. E. Levien

SHIFT SUPVR. CREW 3
C. S. Brockenbush

SHIFT SUPVR. CREW 4
T. J. Merka

UNIT SUPVR.
W. Stauffer W. E. Nelson J. Cleveland C. Larson H. Gaas C. Garza F. W. Glaser

UNIT SUPVR.
L. Poldrack R. J. Lawler M. Thompson M. Poldrack H. R. Mowdy F. R. Lina D. Dibbles

UNIT SUPVR.
M. Petzold M. H. Holmes B. Mueck R. Clayton O. Brogger L. Hranicky B. Rodriguez

UNIT SUPVR.
T. A. Gaines L. O. Tharp J. Hruska B. Kornegay H. Anderson C. Kocurek E. L. Nunn R. B. Garcia

ARD 003628

ockdale Works
vised: 1982-10-01
heet 9

Safety and Health Steering Committee

Salaried Members

- * Gary Griesbach - Safety Manager
- Bill Eckert - Maintenance Manager
- Matt Everett - Electrode Superintendent
- Reece Newman - Labor Relations Supervisor
- Brooks Parker - Environmental Superintendent
- Jerry Roddy - Potroom Superintendent
- Tom Washam, M. D. - Texas Medical Director

Hourly Members

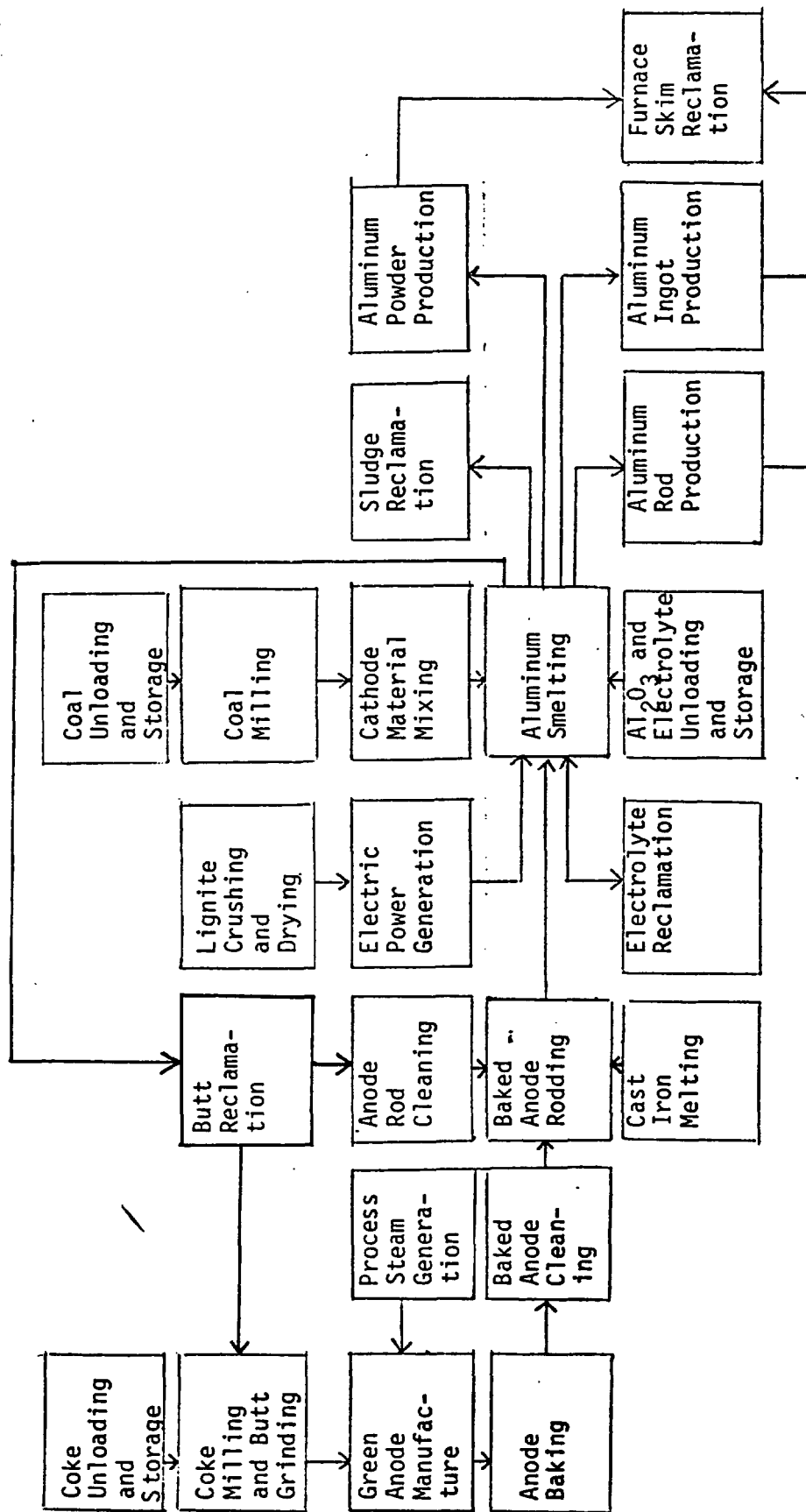
- * Weldon Henson - Environmental Control
- Finis Black - Mechanical Maintenance
- H. P. Dick - Ingot Plant
- James Eichler - Atomizer
- Ed Gaas - Potrooms
- Ike Korenek - Potlining
- Thomas Williams - Carbon Plant

- * Co-Chairman

Hazardous Materials Control Committee

- * Jack Fry - Manager, Procurement and Transportation
- W. J. Davis - Security and Sanitation Supervisor
- Gary Griesbach - Safety Manager
- Gary Johnson - Division Mechanical Engineer
- Brooks Parker - Environmental Superintendent
- Hal Reagan - Texas Public Affairs Manager
- Tom Washam, M. D. - Texas Medical Director

* Chairman



INDUSTRIAL HYGIENE AUDIT
1983 JANUARY 18-20

Tuesday, January 18

- 8:00-8:30 - Meet with Allan Clayton and Brooks•Parker final planning
- 8:30-9:00 - Meet with Jack Drake and staff to outline audit procedure
- 9:00-10:00 - Meet with Jack Drake privately
- 10:00-12:00 - Meet with Allan Clayton and Brooks Parker review Industrial Hygiene facilities, personnel, and administration of Industrial Hygiene program
- 12:00-1:00 - Lunch with managers, superintendents, department heads and Safety and Health Committee.
- 1:00-2:00 - Meet Allan Clayton and Brooks Parker to continue review of facilities, etc.
- 2:00-3:00 - Meet with Dr. Tom Washam and Gary Griesbach to discuss interface between Medical, Safety and Industrial Hygiene
- 3:00-3:30 - Meet with Larry Chesney and Eddie Clark to discuss interface between Engineering and Industrial Hygiene
- 3:30-4:00 - Meet with Jack Fry to discuss interface between Purchasing/Traffic and Industrial Hygiene
- 4:00-4:30 - Meet with Carl Hudson/Reece Newman to discuss interface between Human Resources/Industrial Relations and Industrial Hygiene

Wednesday, January 19 - Plant Tour

- 8:00-9:15 - Carbon Plant - accompanied by Matt Everett, Thomas Williams
- 9:15-10:00 - Rodding Room - accompanied by Matt Everett, Thomas Williams
- 10:00-12:00 - Potrooms accompanied by Jerry Roddy and Ed Gaas
- 12:00-12:45 - Lunch

Industrial Hygiene Audit

Wednesday, January 19 - continued

- 12:45-1:45 - Ingot/Properzi accompanied by Ted Randall
Group 1 and Huey Dick
- 12:45-1:45 - Maintenance accompanied by Bill Eckert and
Group 2 Finis Black
- Group 1* 1:45-3:15 - Services accompanied by Bob Turner, Ike
Korenek and Weldon Henson
- Group 2* ~~3:15-4:30~~ ^{1:45-3:15} - Atomizer accompanied by Bob Hubbard and
James Eichler

Thursday, January 20

- 8:00-9:00 - Wrap-up with Allan Clayton, Brooks Parker,
Glade Lantz
- 9:00-10:00 - Wrap-up with Managers, Department Heads and
Superintendents

FROM

S. J. KNIGHT

TO

MEMORANDUM

ROCKDALE WORKS

1983 January 03

RE: REMOVAL OF ASBESTOS CONTAINING MATERIALS

Due to health hazards associated with asbestos, special precautions must be taken anytime materials containing asbestos are removed. Attached to this letter is a list of asbestos containing materials in the plant. If you plan to remove any of the materials on this list, contact Brooks Parker at Extension 235 ahead of time, to find out what precautions should be taken.

Most likely, there are asbestos containing materials in the plant which are not on this list. If you plan to remove any materials which you suspect may be asbestos, such as old steam pipe insulation, you may use the attached procedure for determining asbestos containing materials.

Stephen J. Knight
S. J. KNIGHT

SJK 'kk 1/8

Attachment

Copies to:

H. E. Ryan	S. W. Tucker
J. P. Ochoa	R. E. Cox
G. R. Hollas	L. G. Parsons
J. A. Church	L. J. Chesney
J. D. Leggett	J. L. Chesnutt
J. R. McClain	J. D. Quinn
J. Throckmorton	C. Allison
N. E. Peterson	E. V. Patschke
R. L. McGee	R. E. Laskie
F. C. Korenek	E. D. Stough
C. J. Rozacky	J. Z. Krall
L. Hammett	C. R. Unnasch
J. R. Green	J. C. Lee
F. P. Amuso	S. E. McFaul
S. J. Spell	C. P. Kouba
W. T. Eckert	J. M. Mitchell
E. B. Parker	V. G. Pomykal
A. Glaser	R. C. Remaley

ARD 003634

 ALCOA

5-4563 (REV 11-68)

ASBESTOS CONTAINING MATERIALS IN THE PLANT

1. Boiler insulation - Building 66.
2. Boiler stack insulation - Building 66.
3. Water filter insulation - Building 66.
4. Anode mixer insulation - Building 54.
5. Mixer insulation - Building 127.
6. Steam piping insulation - Buildings 33, 35, 45, 48, 49, 50, 80, 81.
- * 7. 446 reactor fume fans insulation.
8. Brake linings for crane hoists and bridge brakes.
- * 9. Brake linings on all plant vehicles.

* - Starred items may or may not contain asbestos.

Pabco technical bulletin

Pabco high temperature insulating systems

PTB-48-7A
February 15, 1979
Replaces PTB-48-7

ASBESTOS IDENTIFICATION IN OLD CALSIL INSULATION*

Because of the health hazards involved in working with asbestos, it is essential that old asbestos-containing calsil be properly identified to avoid accidental worker exposure during maintenance or removal procedures.

Prior to the early seventies, all calcium silicate insulation, and several other types as well, contained asbestos as the reinforcing fiber. Most of the asbestos used was chrysotile, but other types such as crocidolite and amosite were also used. All are hazardous to health.

Since the early seventies, all manufacturers have switched to either glass or organic fibers for reinforcement. Because of the refractory nature of asbestos fibers, they are not destroyed by the flame from a propane (Bernzomatic) torch. Rather, they glow as little incandescent rods in the propane flame. Since the newer fibers -- glass, rayon, polyester, cotton, etc. -- are destroyed by the propane flame, this provides an easy means of positive identification for asbestos.

The simple procedure is as follows.

1. Break a small piece of insulation off a section of calsil.
2. Heat the broken surface with the flame from a propane torch.
3. Observe. Figure 1 shows asbestos-containing material. The material in Figure 2 does not contain asbestos.
4. With some experience, a good worker can break off a chunk of insulation and tell by eye whether or not asbestos is present. A small magnifier makes the process even simpler to carry out.

*NOTE: Since December, 1978, the Pabco Division started to mark all of their Super Caltemp production with an identifying green stripe that shows it is asbestos free.

"The technical data shown are considered by us to be accurate and reliable; however, no warranties, express or implied, are given or intended, and any such warranties are expressly disclaimed."

ARD 003636

Figure No. 1

Appearance of asbestos-containing insulation in propane flame. Asbestos fiber does not melt and shows up as little glowing rods in the flame.

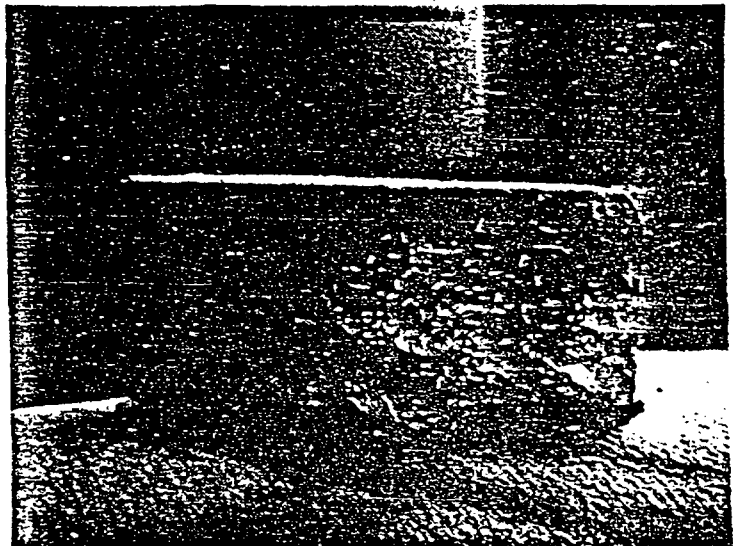
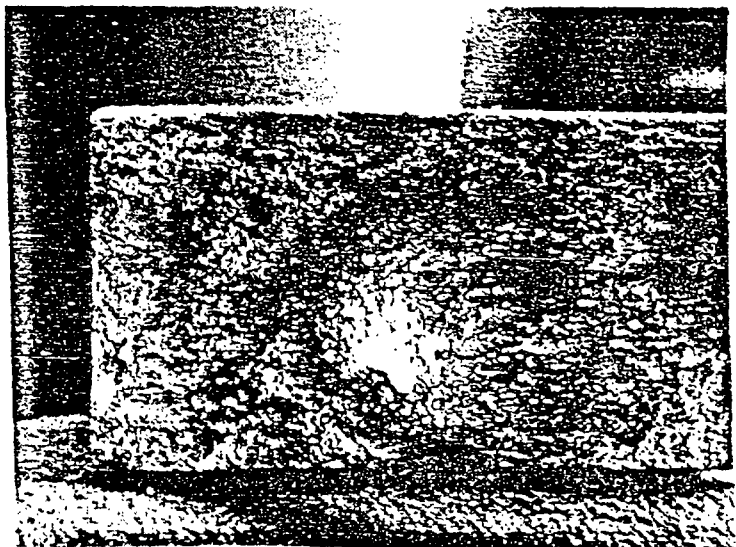


Figure No. 2

Appearance of non-asbestos insulation in propane flame. No rods.



FROM E. BROOKS PARKER
ROCKDALE WORKS

TO MEMORANDUM

1983 January 12

RE: INDUSTRIAL HYGIENE AUDIT - 1983 JANUARY 18-20

I recently distributed some information on Industrial Hygiene concerns and control equipment to most of you for your use in preparing for the upcoming Industrial Hygiene audit. It is intended to serve as a reminder of known major problem areas in the various departments and thereby help you in fielding any questions the auditors might have along these lines.

The auditors will probably want to know something about how you indoctrinate new employees and retrain older employees in these areas. Frequency of required training is shown as an attachment to Industrial Hygiene Rule 000 in your Safety Manual. Jim Richter and I are available to help you in this effort and you will be receiving quarterly reminders of progress in meeting these requirements. In addition, you should consider using safety contacts as a supplement to the formal training.

Indoctrination of new employees, whether fresh off the street or transferred in from other areas of the plant, needs to be addressed also. Specific instruction concerning health hazards needs to be included in the orientation which these people receive when they report for work. Such information should also be included in JSA's where appropriate.

Knowledge of how these things are accomplished in your department will be needed in answering the audit team's anticipated questions.

Give me a call if you need help.

E. BROOKS PARKER

EBP/mz

Attachment

cc:
Matt Everett
Bob Turner
Ted Randall

Jerry Roddy
Bob Hubbard
Bill Eckert

ARD 003638



CARBON PLANT

Concerns

- Coal Tar Pitch Volatiles
 - Mixer floor
 - Press Room
 - Cleaning mixers, conveyors, screws
- Noise
 - Ball Mill area
 - Hummer screens
- Silica
 - Gunniting flue walls

Control Equipment

- Green mill dust collection system
- Mixer ventilation system
- Sound booth - ball mill area

RODDING ROOM

Concerns

- Noise
 - General area - 85 dBA - hearing protection recommended
 - Hanging Station - 90 dBA - hearing protection required
 - Friction joining
- Trichloroethane - stub dipping

Control Equipment

- Ceiling baffles for noise control
- Wall covering on southwest wall for noise control
- Noise enclosure around impactor
- Noise enclosure around stripping press hydraulic equipment
- Dampers on trolley bells
- Bumpers on trolleys
- Ventilation system at stub dipping station

POTROOMS

Concerns

- Fluorides
- Dust
 - General area - ore bucket filling
 - ore bin filling
 - pattern bucket filling
 - Bath crusher - CY 19 front end loader - respiratory protection required
- Noise
 - Siphon rowelling - 115 dBA - hearing protection required
 - TCC crews - cleaning butts, crust breaking - 85 dBA - hearing protection recommended
 - Bath crusher - belt attendant - 85 dBA - hearing protection recommended
 - Walden Front End Loaders - CY 19 charging hopper - 90 dBA, hearing protection required
 - Butt bath pick-up - 85 dBA, hearing protection recommended
- Heat Stress

Control Equipment

- Potroom fume collection system
- Gatorade dispensers
- Catco crane cab ventilation systems

POTLINING

Concerns

- Coal Tar Pitch Volatiles/methyl naphthalene
 - Seam mix mixing
 - Seam mix installation - respiratory protection required
 - Mixing C38 cement - respiratory protection required
- Silica
 - Installing pot insulation, respiratory protection required
 - Dumping potshells in Bldg. 27
- Asbestos
 - Removing potshells and cleaning pot stalls, respiratory protection required when shell is underlain with asbestos millboard strips
 - Cleaning pot bottoms when shell was underlain with asbestos millboard, respiratory protection required
- Metal fume
 - Cutting collector strap bolts, respiratory protection required
- Fluorides
- Dust
- Noise
 - Potdigging, hearing protection required
 - Seam tamping with rammer
- Caustic
 - Cleaning potshells prior to pot repair

Control Equipment

- Ventilation system in mixer building

ENVIRONMENTAL CONTROL

Concerns

- Fluorides and Dust
Bag changing - respiratory protection required during
blowdown and bag removal
- Noise
Bag changing - noise from operating units
A398 and A446 operators - if spending extended time
under reactors
- Coal Tar Pitch Volatiles
Changing bags in A446 units - respiratory protection
required during blowdown and bag removal
- Pitch burns
A446 bag changing

Control Equipment

UTILITY/CONTROL/LABOR POOL

Concerns

- Dust
 - Ore shed, respiratory protection required when working in basement
 - Cleaning ore bridge
- Noise
 - Ore shed when opening car hopper slide gates
 - Repairing siphons, using air wrench
- Asbestos
 - When replacing transite duct sections
- Confined space entry
 - Inventorying tanks - follow confined space entry rules
- Fluorides
 - Pot sampling
 - Taking pot temperatures

ATOMIZER

Concerns

- Noise
 - Bldg. 401 - during atomizing, hearing protection required except in soundproof room
 - Bldg. 402 - compressor house - hearing protection required when assigned to work in building
- Dust
 - Cleaning rotex screens
- Inert gas
 - Confined areas of the plant
- Ionizing radiation
 - Portaspec unit in Bldg. 401, film badges required

Control Equipment

- Soundproof room in Bldg. 401

INGOT/PROPERZI

Concerns

- Noise
 Properzi operator - 90 dBA, hearing protection required
 All other production areas - 85 dBA, hearing protection recommended
- Chlorine
 DC casting areas primarily but leak could affect entire area
- Si Cl₄, Freon
 No. 3 D Casting area

Control Equipment

MAINTENANCE

Concerns

Bldg. 44 - Machine Shop

- Noise
 Chambersburg hammer
- Welding fumes

Bldg. 144 - Garage

- Welding fumes
- Engine exhaust
- Battery fumes
- Solvent
- Asbestos (brake linings)

Bldg. 48 Yard Service

- Paint fumes and solvents
- Herbicides

Bldg. 51 - Electric Shop

- Solvents
- Asbestos (brake linings)

Bldg. 66 Boiler House

- Noise - 90 dBA, hearing protection required (except in soundproof room) when assigned to work in area
- Asbestos - when working with old insulation. Rules for removal of asbestos must be followed (respirators, wet down, place in bags)

Bldg. 34 Ingot

- Noise - 85 dBA in all production areas. Hearing protection recommended.
- Chlorine - when working on chlorine system, respiratory protection required
 - when repairing chlorine leaks, self-supplied breathing equipment is required
- Si Cl₄/Freon - when working on Si Cl₄ system leaks, appropriate respiratory protection is required.

Bldg. 27 Pot repair

- Welding fumes
- Noise
 Shell repair
 Melting buttons from anode buss
- Caustic - residue on inside of potshells
- Solvents

Brickmasons

- Noise - Hearing protection required when operating brick saws.

Maintenance - continued

Field areas

- Welding fumes
- Confined spaces
- Chlorine - water and sewage treatment
- Various Nalco water treatment chemicals
- Lime - Bldg. 70
- Noise

Control Equipment

Bldg. 44

- Welding fume exhaust systems
- Noise enclosures for electric welders

Bldg. 144

- Vehicle exhaust ventilation system

Bldg. 66

- Noise proof room

Bldg. 27

- Welding fume exhaust systems

PLANT I.H. AUDIT

Rochdale
(LOCATION)

83-01-18, 19, 20
(DATE)

- | |
|----------------|
| 1. EXCELLENT |
| 2. GOOD |
| 3. FAIR |
| 4. POOR |
| 5. NONEXISTENT |

1. POLICIES & PROCEDURES

Management awareness, participation, and commitment. Published health protection policy. Effective Joint Safety & Health Committee.

2

2. ORGANIZATION & STAFFING

Appropriate for plant needs. Adequate manpower. Professional and technical training.

3

3. I.H. FACILITIES & EQUIPMENT

Environmental monitoring equipment and sampling procedures. Laboratory analytical support.

1

4. WRITTEN I.H. PROGRAMS

Essential for managing function. Program continuity. Planning a pro-active preventive program for health protection. I.H., Respiratory, Hearing Conservation, and others. *More definitive schedule*

3

5. ENVIRONMENTAL SURVEILLANCE

Monitoring employee exposures. Baseline, continuing surveillance, effectiveness of engineering controls, and special problems.

3

Expand baseline

6. RECORDKEEPING

Adequacy of records. Identifying overexposures. Documenting below PEL. Legal requirements.

1. *Follow-up*
2. *Pae '82 records*

3

7. HEALTH HAZARD CONTROLS

Substitute materials. Administrative controls. Engineering controls. Personal protection. Implementation and maintenance.

Beards, Enforcement

2

8. HEALTH HAZARD TRAINING

Types of employee training. Frequency. Effectiveness. Hourly and supervisory.

More definitive schedule + program review

3

9. COMMUNICATIONS & COORDINATION

Working relationships between departments. I.H., Medical, Safety, Production, Engineering & Maintenance, Industrial Relations, and Procurement.

1

10. HAZARDOUS MATERIALS CONTROL

Materials Inventory, Material Safety Data Sheets, Container Labeling, Administrative Controls, Hazardous Materials Control Committee.

2

I. H. Audit 83-01-18 thru 20

Consider publicizing I&H policy
More detailed testing schedule
Respiratory protection

1. Cleaning & sanitizing?

2. Fit testing - beards

Training - detailed outline

Respirator - beard - silica - ind. fit lining?

Wrap-up.

Commitment - high

Mechanism and resources - weak

Publish policy

Get other measuring equipment

Detailed sampling & training schedules

Baseline sampling needed

Beards w/ respirators

Follow-up on changes in policies. ^{note changes in} exposure record.

Update ~~the~~ materials list

cess," as contrasted with an inspection, which looks specifically at physical safety and health hazards at the worksite.

Thomas McCully, special assistant to OSHA Administrator Thorne G. Auchter, told BNA Jan. 10 that "top management support" is listed as the first factor in an effective occupational safety and health program because of the assistant secretary's strong belief that such a commitment is necessary for an effective program. Without top management support, the OSHA document stated, an agency's program "cannot obtain necessary resources, and cannot obtain the necessary cooperation of all levels of line management."

Listed as minimum indicators of an agency head's commitment are these elements: written documentation outlining program policies and procedures; appointment of a designated agency safety and health official with administrative authority; personal performance standards; personal participation in the program; and resources devoted to the program.

Other Key Elements

Other elements that should be common to all effective programs, according to the written procedures, are these: program planning "whereby an agency determines how to use its resources most effectively, and sets goals and objectives for doing so"; program implementation including training, recordkeeping, inspections and accident investigations, and abatement; and program self-evaluation.

During fiscal 1983, OSHA will develop a targeting system for evaluations based on Office of Workers' Compensation Programs data, according to the written procedures. Development of such a system for evaluations as well as for inspections has been listed by OSHA Administrator Auchter as one of his initiatives for upgrading federal safety and health conditions (Current Report, Oct. 21, 1982, p. 408). However, until the new system is developed, selections for evaluations will be based on Federal Accident Reporting System data.

OSHA's Office of Federal Agency Programs is responsible for selecting the evaluation team. Agencies are to be given the evaluation plan "at least one month before the opening conference" which marks the official starting date of the evaluation. "Since the opening conference sets the tone of the evaluation it is important that top managers agree on the purpose and scope of the evaluation," the OSHA document stated.

The evaluators will examine documents, visit agency headquarters and intermediate offices; interview program personnel, supervisors, employees, employee representatives, and safety and health committee members; and will complete their survey with a closing conference, 90 days after the opening conference.

In an effort to expedite the system, the written procedures allow 45 days, rather than 90 as previously stated, for a final report to be sent to the agency being evaluated. The agency, in turn, will have 30 days, rather than 60 days, to respond.

FACOSH Approved Document

McCully pointed out that members of the Federal Advisory Council on Occupational Safety and Health were given the opportunity to participate throughout the process of reviewing and formalizing the evaluation procedures. At its Oct. 6 meeting, the members endorsed Auchter's proposal for shortening the process by reducing the time period for issuing and responding to the final report (Current Report, Oct. 14, 1982, p. 393).

Litigation

UNION'S REQUEST TO PERMIT ARBITRATION OF FACIAL HAIR POLICY DENIED BY COURT

A company policy which required employees to shave off facial hair that would interfere in obtaining a satisfactory seal for respirators was not a proper subject for arbitration under union-company contract provisions, according to a ruling of the U.S. District Court for the Southern District of Texas.

This decision, issued Dec. 30 in *Oil, Chemical & Atomic Workers International Union, Local 4-367 (OCAW) v. Shell Oil Company* (No. H-81-1908), denied the union's request for an order compelling the company to arbitrate the reasonableness of its facial hair policy.

This case arose after Shell Oil announced the policy requiring all employees in maintenance and laboratory positions to remove facial hair, including beards, sideburns, and mustaches. The union responded by filing a grievance on the ground that the policy was both unreasonable and discriminatory on its face and administered in an unreasonable and discriminatory manner. It failed, however, to cite any instances of discipline or discharge in operation of the policy.

Subsequently, after receiving the company's answers to the grievance petition, the union decided to request arbitration of the issues. When the company refused to submit the grievance to arbitration, OCAW filed an action in the Texas federal court for an injunction requiring Shell Oil to comply with its request.

The court indicated that the arbitrability of the company's facial hair rule depended on a review of contractual provisions which set up procedures for formulating and negotiating safety and health policies at the worksite. It distinguished this case from one involving actual discipline or discharge of an employee as a result of application of the policy.

Language in applicable clauses permitted recommendations and proposals on safety and health matters either through a joint union-employer safety committee or at negotiation sessions between both parties, the court stated, but these provisions indicated that the subject matter discussed or the company's ultimate decisions were excluded from grievance and arbitration procedures. The court therefore denied OCAW's request for an injunction on the basis that the "union cannot ... obviate these exclusive procedures agreed to by the parties, by arbitrating the reasonableness of a [facial hair] policy."

This decision, written by U.S. District Judge Gabrielle K. McDonald, will appear in a future Decisions issue.

Consultation

OSHA GRANTS CONTRACT TO PROVIDE ON-SITE CONSULTATION TO EMPLOYERS

On-site consultation on workplace safety and health hazards will be provided to Pennsylvania and New Hampshire employers under a one-year, \$213,000 contract awarded to a Maryland consulting firm, the Occupational Safety and Health Administration announced Jan. 5.

The Pennsylvania and New Hampshire programs will be operated under the contract granted to Enviro Control, a Division of Dynamac Corporation, Rockville, Md. In all other states, consultation programs are operated by state agencies or universities.