LOUISIANA DIVISION
CONSOLIDATED AUDIT

OCCUPATIONAL HEALTH

MARCH 1992
DOW CONFIDENTIAL

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INTRODUCTION

Your active participation in this plant program evaluation is vitally necessary. The objective of the review is to assure that employee health is being adequately protected in your plant/area. This r view will focus on the efforts by your facility to anticipate, recognize, evaluate and control occupational health hazards. The will be accomplished by evaluating all areas which are affected or impacted by occupational health considerations, Louisiana Division I.H. programs and safety standards, and government regulations.

FORMAT

There are three phases for the plant program evaluation.

1. Preparation and Questionnaire Distribution

   The plant Industrial Hygiene contact and the Industrial Hygienist are responsible for reviewing the plant and Industrial Hygiene original data files, reviewing the Program Documentation and completing the attached questionnaire. The completed questionnaire should be reviewed with the Plant Superintendent and then given to the Louisiana Division Audit Facilitator to be distributed to the Occupational Health Audit Team leaders ten calendar days before the audit.

   The questionnaire is used to identify program strengths and weaknesses for Phase 2 of the review .

2. Formal Program Review

   At the time of the formal audit, the plant Industrial Hygiene Contact and Industrial Hygienist will present a synopsis of the strengths and weaknesses from each program area e.g. respiratory protection, hazard communication, etc. The length and detail of each presentation should be based on the particular subject but generally should be no longer than ten minutes. Further time will be needed in those areas where special documentation is shown to the auditors. The presentation should include those areas where improvements are needed and the proposed corrective action.

   A walk-through of the facility will also be conducted. During the walk-through, several questions regarding the Industrial Hygiene program will be asked of plant personnel. The walk-through team will review all areas of the plant related to occupational health concerns. The following areas should be reviewed as part of the walk-through:

IH HAZCOM Manual (location and 24 hour accessibility)
Employee bulletin boards (required postings)
Control room
Lunch room (minimal contamination potential)
Laboratory
- container labeling
- fume hoods - survey date and proper use
- manometers

Process areas
- container labeling
- unloading/loading stations
- drumming stations
- bagging/boxing stations
- process sample points
- noise areas greater than 90 dBA
- radioactive sources
- OSHA regulates areas
- asbestos locations and block posting
- other potential exposure locations or job tasks

Shop/maintenance areas
- welding areas (local exhaust and general ventilation)
- solvent handling (adequate ventilation)
- asbestos storage and disposal locations
- noise sources greater than 90 dBA

Protective equipment
- employee change rooms (clean/dirty sides)
- protective equipment storage areas
- protective equipment decontamination areas
- respiratory storage areas
- respirator cleaning stations
- breathing air sources (bottles or compressors)
- respirator cartridge dates
- breathing airline fittings (Hansen (BK/HK)
- breathing airline waist belts

Housekeeping (related to chemical exposures)

3. Documentation Follow-up

Within two weeks after completion of the audit, the evaluation findings and recommendations for program improvements will be summarized in the audit report to the Plant Superintendent.

Within 45 days after the audit, the approved (reviewed/approved by the Major Manager) implementation plan is issued to the Core Audit Team and Occupational Health Audit Team Leaders. A status report is to be issued after six months and again after one year.

INDUSTRIAL HYGIENE

EDUCATION AND TRAINING

SUMMARY:

Employees receive HazCom training annually. Material safety data sheets are kept current and are located in the Safety Environmental office. All Dow and Non-Dow personnel receive HazCom training annually.

IMPROVEMENTS:

HazCom information has been included on indoctrination checklist.

STRENGTHS:

Hazard communication information is covered on the Cell Service indoctrination checklist.

OPPORTUNITIES FOR IMPROVEMENTS:

Include review of CPAI (Chemical Physical Agent Inventory) as part of initial training.

RESPIRATORY PROTECTION PROGRAM

SUMMARY:

The respirators are inspected as part of the C-9 checklist. Non-Dow personnel are required to have a mouth bit respirator on their person.

IMPROVEMENTS:

Upgraded escape respirator to handle ammonia in addition to acid gas respirators.

Increased emphasis of plant personnel on respirator use and maintenance.

Installed two respirator cleaning stations where they would be accessible to everyone.

STRENGTHS:

All respirators are checked regularly. Personnel are required to show ability to use SCBA annually.

OPPORTUNITIES FOR IMPROVEMENTS:

Continue to raise awareness of respirator protection and maintenance to block personnel.

Program to add full face escape respirator audit to C-9 checklist.

VENTILATION PROGRAM

SUMMARY:

Lab hoods are on the C-9 checklist and inspected for compliance.

IMPROVEMENTS:

Established sheltering area in contractor change house.

Installed a new Hepa filter with particulate break through shutdown.

Instituted a "No Smoking" policy for the entire Cell Service block.

Installed manometer on AT-500 scrubber.

STRENGTHS:

Installed a new Nepa filter with particulate break through shutdown.

Hoods are check annually.

Procedurally, we do not operate hood or use debagger in asbestos room without collection system operating.

OPPORTUNITIES FOR IMPROVEMENT:

Need to continue to develop an instrumental method of analysis for kynar and Teflon content that will not require the use of scrubber AT-500.

PERSONNEL PROTECTIVE EQUIPMENT

SUMMARY:

Specific protective equipment is required for each job on Safe Work Multi Permit. All PPE is evaluated by the PPE committee and Industrial Hygiene Department.

STRENGTHS:

Proper PPE equipment is available for all personnel for any job.

Improved and implemented more effective decontamination procedures for block.

OPPORTUNITIES FOR IMPROVEMENTS:

Continue training for block and contract personnel on adequate decontamination.

HEARING CONSERVATION

SUMMARY:

all areas above 90 decibels are considered hearing protection areas with signs posted. all personnel are included in the hearing conservation program.

STRENGTHS:

audio grams are conducted annually for Dow and contractors that have been in the block for greater than one year.

Annual training is done on hearing conservation.

OPPORTUNITIES FOR IMPROVEMENT:

Continue to look for ways of reducing the level of noise produced by baglifter.

When forklift number 8010 is replaced the new forklift will be purchased with noise abatement package, which was purchased on the new forklift number 1643.

DATA GENERATION AND MONITORING

SUMMARY:

The I.H. contact is responsible for all exposure monitoring in the block. Sampling devices are calibrated prior to and after each use.

STRENGTHS:

Cell Service block has its own sampling equipment for monitoring for asbestos exposure and for instantaneous noise sampling.

OPPORTUNITIES FOR IMPROVEMENT:

Complete monitoring program by end of third quarter.

ASBESTOS

SUMMARY:

All asbestos abatement jobs are performed by trained personnel (Petrin).

IMPROVEMENTS:

We have discontinued the use of asbestos gaskets as suitable substitutes have become available.

STRENGTHS:

A survey of locations of asbestos was done and is monitored annually.

All removal is done by trained abatement personnel.

Cell Service has no asbestos pipe insulation.

OPPORTUNITIES FOR IMPROVEMENT:

Continue asbestos survey and removal.

RADIATION

SUMMARY:

The Cell Service block presently has no radioactive producing sources.

GENERAL - INDUSTRIAL HYGIENE

SUMMARY:

No food, drinking or smoking are allowed in operating areas of the plant. Everyone is encouraged to wash hands before eating and after using the bathroom.

IMPROVEMENTS:

Added personal hygiene section to indoctrination checklist.

STRENGTHS:

Excellent housekeeping in block - strong emphasis.

No smoking permitted in the Cell Service block.

Designated areas are used for storing food and eating.

OPPORTUNITIES FOR IMPROVEMENTS:

Continue to reduce/eliminate potential asbestos exposure by practicing good housekeeping.

MEDICAL

SUMMARY:

All Dow employees and contractors in the block for one year or more have a physical every year. All injuries no matter how minor are required to go to Medical. Contractors are sent to their supervisor for medical treatment. It is a Cell Service policy if it is a life threating or sight threating we will send the contractor to Dow Medical for immediate treatment.

IMPROVEMENTS:

Continue the emphasis on injury prevention.

STRENGTHS:

Reporting of all injuries no matter how small or insignificant is required and the appropriate investigation is conducted.

NON - DOW EMPLOYEES

SUMMARY:

All Non-Dow employees receive In-block indoctrination on the safety rules of the plant, proper PPE, HazCom. Eating, break areas are provided for contractor use. Rest rooms and clean up facilities are provided.

IMPROVEMENTS:

Built a new contractor change house/lunch room facility.

Improved block indoctrination checklist.

Involvement of contractor personnel in brainstorming ways to improve problem areas.

STRENGTHS:

We have a contractor facility that will house all contract employee's for sheltering, meetings etc.

All Non-Dow contractors are aware of block hazards.

MSDS are available and accessible.

OPPORTUNITIES FOR IMPROVEMENT:

Better decontamination of PPE training and procedures.