

March 15, 1992

To: Gary Meier

From: Geof Kusch

Thoughts and comments following the Occupational Health portion of the Consolidated Audit for the Power I and Utilities Plant.

1. The indoctrination films were excellent. There was a good emphasis on potential hazards and health effects of exposure to those hazards.
2. There is a need for MSDS sheets on the "consumer" chemicals which are stocked in the warehouse. This problem is currently being addressed.
3. The respiratory protection program appears to be well structured. Employees receive medical approval prior to fit testing, and non-Dow employees must have a card showing that they have proper fit testing before beginning a job.
4. It was mentioned that one of the employees is claustrophobic and has difficulty wearing a respirator. This employee should be evaluated at the Medical Department.
5. All asbestos work is performed by qualified asbestos workers. An area of the plant with damaged asbestos insulation was identified and needs to be repaired.
6. The asbestos gasket storage area is well labelled. It is cleaned by Petrin on a quarterly basis. The area on the second level should have something under it to prevent any fibers from

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falling through to the level below. Gaskets which are of a proper size could be stored in plastic bags.

7. The adequacy of ventilation in the areas where welding is performed needs to be evaluated.
8. All the Power I Plant requires hearing protection. There are some areas with noise levels above 105 dB, and these should be labelled with special signs advising the use of double hearing protection. A segment could be added to the indoctrination video showing the proper use of double hearing protection, and consideration should be given to the need for all employees to have double hearing protection available.
9. The development of personal noise dosimetry data on all employees is an excellent idea. It is also excellent that the plant is developing data on non-routine tasks. Utilizing dosimeters which will produce histograms of the noise exposure will help in delineating particularly high noise tasks.
10. The level of noise in the plant makes it important that off the job hearing protection continues to be emphasized as it has been in the past.
11. Heat stress can be a hazard in the summer months, and there is good emphasis on this in the Health Day training. Frequent breaks, adequate fluids, and cooling vests are all utilized to protect against this hazard.
12. There are few ergonomics issues in this plant due to the nature of its function. Valve turning presents a potential hazard in this regard.
13. An auditing system needs to be developed to be certain that non-Dow employees comply with the noise standard. This is being worked on by Medical and IH.
14. Consideration should be given to making the control room a non-smoking area so that exposure to environmental tobacco smoke is eliminated. Geof Kusch will send a copy of the NIOSH Technical Bulletin on this subject to Ken Fox.