

To: John Friend

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From: A. H. Sather
Date: December 31, 1985

Subject: INDUSTRIAL HYGIENE PROGRAM ASSESSMENT

Interoffice
Communication

VISTA

The following is the plants response to the subject report dated October 8, 1985. The response follows the assessment report format.

1. Respiratory Protection Program - The Safety Department will update this program during January, 1986. The new program will not be issued until the medical evaluation issue has been resolved. Our plans call for the revisions to include:
 - a) Selection criteria for respirator use vs job.
 - b) Incorporation of memo revisions to the program.
 - c) Deletion of Manufacturer recommendations.
 - d) Other items that may need to change due to the proposed revision to the OSHA Respiratory Protection Standard, part 134.
2. Blending and Compounding
 - a. The Safety Department will coordinate with the Maintenance and Compound Departments to conduct personnel and/or area lead monitoring for jobs where a high exposure potential exists.
 - b. Regarding the concern that work clothing be properly disposed of and that personal hygiene guidelines are followed, the Compound Department has done the following:
 - Work clothing use and disposal and personal hygiene practice requirements were reviewed during the December safety meetings.
 - A vacuum cleaner will be permanently mounted for the specific purpose of contaminant removal. A requisition for the purchase of this unit has been issued. Installation will occur upon arrival of the unit.
 - c. All combined lead/total dust sample cassettes are being sent directly to C-TEC for analysis. The Aberdeen Lab is responsible for analysis of samples taken for total dust only.
3. Welding Fume Sampling - The Safety Department will conduct sampling during the second and fourth fiscal quarters, 1986.

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4. Short Term VCM Exposures - Short term sampling using personnel and area measurements are planned for several potential high exposure jobs during fiscal 1986. These jobs include filter pack changes, reactor blanking, valve set-up on top of blend tanks to dump reactors, and other similar types of jobs yet to be defined. Use of area and personal measurements will be used to better define a "protective equipment required area" to prevent casual exposure. Where work permits are issued, this consideration has been and will continue to be made.
5. Validity of VCM Monitoring - Just prior to the program assessment, mechanical problems occurred with the Perkin-Elmer HS-100 gas chromatograph that necessitated the invalidation of 30 badge samples. The problem was found during the early stages of Statistical Process Control Analysis of standard gas runs in the lab. The equipment problems were resolved in early September. SPC methods will continue to be used to reduce the risk of analytical error.

Any questions relating to this response should be directed to the undersigned.

A.H. Sather

A. H. Sather
Safety Director

gmp

c: JF, JWW, DEPARTMENT HEADS, JVV
R.D. Gamblin, T.G. Grumbles, Dr.J.R. Drumwright, MD, - Houston