

FGG: JCI: ~~MMG~~ RF

XF: Aberdeen

TO: John Friend

FROM: Tom Grumbles

DATE: October 8, 1985

Interoffice
Communication

SUBJ: ABERDEEN PLANT INDUSTRIAL HYGIENE PROGRAM ASSESSMENT

VISTA

The program assessment was conducted on September 24 - 25. The team consisted of myself, Keith Fogg, Safety Director LAB plant, Dr. Drumwright, Medical Manager, and Michele Goodreau, Environmental and Health Specialist. Action taken on the recommendations from the 1983 audit report were reviewed and discussed. Interviews were held with personnel in the safety department, various hourly operations and laboratory employees, and operations and mechanical supervision.

Interviews with staff indicated a good awareness of and commitment to the industrial hygiene program. In particular, the supervisory follow-up on measured overexposures to find exposure sources is good. Employee interviews did not reveal any overt health or safety concerns. The mechanical department does safety audits on a random basis and uses a form to assure consistency in this effort. This type of "self-auditing" is a very positive idea and certainly encouraged.

Below are the assessment team's recommendations. Items noted on the walk-through inspection and discussed with you are not included below.

1. A large amount of time was spent reviewing and discussing the respiratory protection program. Specific recommendations are below.
 - a. The respiratory protection program should contain specific ~~selection~~ criteria for respirator use. The program ~~lacks~~ specificity as to the selection criteria for specific jobs, or classes of jobs with known exposure potential. There appears to be some confusion as to what equipment should be considered in VCM service and subsequently what respiratory equipment is needed for jobs on that equipment.
 - b. Reference was made in conversations to various letters that had been issued addressing specific uses of respirators. These "guidance" letters should be consolidated into the program.
 - c. The manufacturer instructions included in the program as appendices should be reviewed and consideration given to removing them from the policy. They are redundant in many cases and of little practical use as written.
 - d. Based on action items (a) and (b) above, Section II, Selection of the program should be revised to reflect these changes.

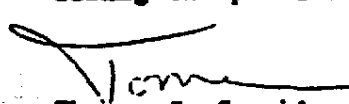
VVV 000017762

2. In Blending and Compounding several recommendations regarding lead exposures are made below.
 - a. Maintenance personnel work in the lead areas and are included in the blood ~~lead~~ program. Consideration should be given to monitoring maintenance jobs in this area to determine airborne lead exposures. This could be area monitoring if done carefully.
 - b. A review of personnel clean-up procedures at the end of shift should be done to assure proper disposal of contaminated work clothing, and that personal hygiene guidelines are followed.
 - c. To obtain a total dust measurement approximately one-third of the lead air samples are handled at the plant before shipment to the analytical laboratory. This practice should be stopped as there is potential to disturb the integrity of the lead analysis. Total dust numbers could be obtained by the laboratory being used for lead analysis.
3. To determine the effectiveness of exhaust ventilation systems and quantify exposures, air sampling of welding operations in the maintenance shop should be considered.
4. Further sampling of short-term exposures should be done to determine respiratory protection needs and workplace procedures.

For recognized high potential exposure jobs where air-supplied equipment is used, a review of "job-site" preparation should be done to preclude casual exposures to those not directly involved in the job.
5. ~~There was some concern expressed during interviews regarding~~ ~~the maintenance shop.~~ Several instances of measured ~~exposures to personnel who never entered the vinyl area on the day of sampling were mentioned.~~

The quality control program that I was to assist the plant in developing has not been developed. I still plan on proposing a mechanism to independently verify the sampling and analytical methods the plant is using.

Please let me know if you wish to discuss any of the above. We are available to assist in accomplishing the above recommendations. I want to thank-you and your staff for their time and cooperation during the plant visit.


Thomas G. Grumbles

ajo/7
cc RDG, JRD, KLF, ALS

VVV 000017763

~~WILLIAM~~
MCCORD CORPORATION

General Offices: 2850 West Grand Boulevard • Detroit, Michigan 48202

November 8, 1974

TELEPHONE
313/875-7000

Mr. Edward Largent
OSHA
Dept. of Labor Technical Services
300 South Wacker
Room 1201
Chicago, Illinois 60606

Dear Mr. Largent:

After reading the standard on Exposure to Vinyl Chloride, printed in the Federal Register (Vol. 39, No. 194 - Friday, October 4, 1974), one area needs further clarification as to its interpretation.

Section (c) (4) p.35896 of the standard states:

"The method of monitoring and measurement shall have an accuracy (with a confidence level of 95 percent) of not less than plus or minus 50 percent from 0.25 through 0.5 ppm, plus or minus 35 percent from over 0.5 ppm through 1.0 ppm and plus or minus 25% over 1.0 ppm."

The preamble to the Vinyl Chloride Standard begins to define a 95 percent confidence level as (p.35893, III(4)) "that the employer is required to take a sufficient number of measurements so that the results obtained are statistically valid." Unfortunately the reader is left without knowing what a "sufficient number" is, no formula or minimum number given.

Secondly, I do not understand the accuracy range requirement completely (p.35896 (c) (4)). I assume it pertains to the analytical procedure and not to the sampling procedure. Please clarify this position of the standard by explaining what is meant by "plus or minus 50 percent from 0.25 through 0.5ppm . .", and if it pertains to both analytical and sampling procedures or just to the analytical portion.

Your help in this matter will be greatly appreciated for I have been unable to obtain a satisfactory explanation thus far.

Very truly yours,

Sarunas S. Mingola
Sarunas S. Mingola
Industrial Hygienist

VVV 000017765

RESERVED
JAN 17 1975
DALLAS REGIONAL OFFICE
U.S. DEPARTMENT OF LABOR