

Monsanto

FROM (NAME & LOCATION)

R.T. Hammann/M.A. Riddle, LP&S 0-22 Ext. 3234/3236

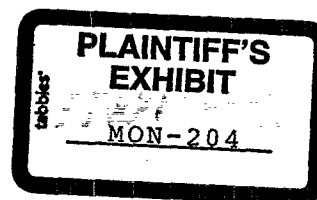
DATE July 7, 1983

CC:

SUBJECT OSHA INSPECTION (6/28--7/1/83)

REFERENCE

TO : G. W. Daues 0-10A



OSHA Inspector, Rex F. McKinney, Industrial Hygienist, appeared at the gate at 13:00 hours on Tuesday, June 28. The purpose of his visit was to investigate an employee complaint stated as follows:

"Pipefitters have been removing asbestos insulation without wearing the proper personal protective equipment. The Company has taken samples to determine where the asbestos is located, but some insulation has been mistakenly identified as non-asbestos."

This complaint was filed with OSHA on 6/27/83, at 11:45 a.m. It was specific to Departments 15 and 16, Department 19, Departments 48/56, and Power 2. The complaint was made by Charles E. Davis who is the pipefitter craft safety representative.

The visit on ^{Tuesday} Monday was to hold an opening conference and go over the complaint against the Company. At the time, he reviewed our OSHA 200 form for 1981 thru the present and commented on our good safety record. He also received a copy of all our forms used by Medical for performing physicals and a copy of the procedures for removal of asbestos and the testing procedure by Pabco.

The personnel present for this opening conference were:

Charles Davis
Vernon Mapes
Dora Sendejas, R.N.
Greg Daues
Bob Hammann

He also mentioned that he had reviewed OSHA inspector, Roy Pigge's report on last year's general health inspection of the plant. He was here specifically on this asbestos investigation, but would cite us for any obvious violation that he happened to note in the course of his inspection. He left at approximately 2:30 after discussions with the comment that he would return the next day to interview people and look at the areas.

Day Two, Wednesday, June 29

Rex McKinney entered the plant at approximately 9:45. A discussion was held with Dan Campbell, Bob Hammann, Charles Davis, and Mr. McKinney. During this discussion, which mainly revolved around sampling, he was given copies of the sampling data of personnel in the area and a copy of our "Asbestos Procedure". H.G. Bullock, Maintenance foreman for insulators, was called in to discuss the interpretation of the procedure, specifically, who was instructed to get the sample. This was stated to be normally taken by the maintenance foreman in the

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field. Mr. McKinney was taken to the I.H. lab and shown the procedures for determining asbestos. He also went to the field where he interviewed numerous people. The people interviewed were:

Herbert C. Doreck, pipefitter
Leonard Dinning, pipefitter
Ryan Pittman, pipefitter
W.R. Sanders, pipefitter
M.F. Whatley, pipefitter
Ed Smith, insulator
Raymond Guidry, insulator
Glenn Eierdam, insulator

From all these people he got the same story. Essentially, they were supplied with proper personal protective equipment, but they felt that insulators were better able to handle the work. The pipefitters specifically stated they didn't feel that they were qualified. On one hand they said they were willing to do the work agreed to by the contract, but on the other hand they stated they thought that the insulators should be doing work around asbestos. He was also shown the change room. He left the plant at approximately 3:15.

Day Three, Thursday, June 30

Mr. McKinney arrived at the plant at 10:00. Charles Davis, Dan Campbell, and Bob Hammann were present. They went to Department 48/56 where interviews were conducted with:

Richard Hobbs, Jr., pipefitter
Pete DeGroot, pipefitter
Charles Virgin, pipefitter

All expressed concern about not having proper training. In fact, Hobbs had not been trained because he had been off two weeks on sick leave and one week vacation just recently.

No checks were made in Department 19 as they did not have maintenance personnel in the area.

Contact was made with Jim Gatewood concerning any work where asbestos insulation would be removed as incidental work. It was determined that they had a job stripping insulation off piping above 16E2 and would be doing this work right after lunch. We went to the area and after the men obtained the proper equipment, sampling pumps were connected to them by both Mr. McKinney and Monsanto Industrial Hygiene for determining a 15 minute ceiling concentration. The two individuals doing this work were G.E. Hoyland and R.V. Nicol. Six pictures were also taken of the men in action stripping the insulation.

Possible Citations

During the work on stripping the insulation material was not wetted down. This is in violation of OSHA Standard 1910.1001 Asbestos, 2. Work Practices, 1) Wet Methods. Also, based on the results of the air sampling, we may be required to provide a physical exam for each of the employees now exposed to asbestos.

This statement under preplacement is that, "the employer shall provide or make available to each of his employees, within 30 calendar days following his first employment in an occupation exposed to airborne concentrations of asbestos fibers, comprehensive medical exam, which shall include, as a minimum, a chest x-ray, a history of elicit symptomatology of respiratory disease, and pulmonary function tests..." Thereafter, this would have to be an annual examination. These are the two items that he mentioned we could possibly be cited on. The second one would not probably be a citation, but would be something we would have to comply with within 30 days.

Day Four, Friday, July 1

Rex McKinney was scheduled to return to the plant at 1300 for the closing conference. He arrived at 1100 and asked to talk with the supervisor, Larry Young, pipefitter leadman, Marvin Janicek, and pipefitters, R.V. Nicol and G.E. Hoyland that were involved in the asbestos stripping job observed on Thursday, June 30. He talked with these people individually and asked some basic questions to verify the area and the type of work that they were doing. Mark Riddle, Charles E. Davis, craft safety representative, and Dan Campbell were present during these discussions.

After the above gentlemen who were interviewed left, Mr. McKinney asked a few other housekeeping type questions. He then said he would not hold the final closing conference until sampling results were obtained which would take at least 30 days. He did say there was the possibility of citations and just reiterated the possible citations that were discussed on Thursday.

He stated to the pipefitter safety representative that he could be contacted at any time by phone if he had further questions. We escorted Mr. McKinney to the gate and on the way he asked if we had got approval for the pictures that were taken the day before. We told him that we had and that we needed to go to Greg Daues' office to obtain them.

We went to Greg Daues' office to get the pictures and while there had a short informal discussion with Daues concerning Mr. McKinney's future course of action. We discussed the statement that he had made previously that we would probably have to provide an examination for all employees within 30 days following their first exposure to asbestos fibers. We discussed our opinion that we had met the intent of the law which is to establish a baseline data, and that we have already done this due to our ongoing medical program. He said he could not make that decision himself, but that he would discuss this with his supervisor and that we should call his supervisor to discuss our opinions further. His supervisor's name is Jack Fontaine. We then provided Mr. McKinney with the pictures he requested of the asbestos removal job on Thursday, and he was escorted to the gate.

Other Points Noted During The Inspection:

- a) Training came up almost as a broken record. Our initial training of personnel could have been improved.
- b) Some said they were not familiar of how to take the samples, where to take the samples, where to get the proper protective equipment. They all knew, however, that they could at least contact an insulator



to find out what to do, how to dispose of the equipment (i.e., putting the gloves in a bag), how to take the sample (i.e., put it in a plastic bag and taking it to the I.H. lab), or generally what they do when they are handling asbestos.

- c) Doors to the change room are locked and it is not known who has the key in all cases.
- d) Comment was made that we should possibly use the insulators to assist in the training of members of other crafts.
- e) We need to put more emphasis on our hearing conservation as personnel were out in areas with loud noises emitted from compressors and not wearing proper ear protection. In two cases we had to request that people get the proper ear protection. However, this was not noted by the inspector. It was corrected before he could make any comments.

Bob Hammann

Mark Riddle

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Mark Kiddle

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The personnel present for this opening conference were:

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Dora Sendejas (to review Medical)
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Possible Citations

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Other points noted during the inspection:

- a) Training came up almost as a broken record. We did a very poor job in our initial training of personnel.
- b) People are not familiar of how to take the samples, where to take the samples, where to get the proper protective equipment, though, they all new that they could at least contact an insulator to find out where to get it.
- c) How to dispose of the equipment (i.e., putting the gloves in a bag), how to take the sample (i.e., put it in a plastic bag and taking it to the I.H. lab), or generally what they do when they are handling asbestos.
- d) Doors to the change room are locked and it is not known who has the key in all cases. We need to work on a better system for this.
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- f) We need to put more emphasis on our hearing conservation as personnel were out in areas with loud noises emitted from compressors and not wearing proper ear protection. In two cases I had to request that people get the proper ear protection. However, this was not noted by the inspector. It was corrected before he could make any comments.

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