

Interoffice Memorandum

TO (Name and Location)	J.J. Fritsch - Bishop	DATE	11/26/84
FROM (Name and Location)	M.R. Stenzel/B.C. Adams - Dallas	REFERENCE NO.	MRS-095-84 BCA-085-84

cc: G. Ille - Bishop
W.H. Meyer - Bishop
B.A. Melaas - 2
P.E. Hime - 6

S.A. Block - 6
S.P. Engelman - NYO
J.M. Ramey - NYO
G.A. Rodenhausen - NYO

SUBJECT: Bishop Industrial Hygiene Audit - October 25-26, 1984

The Bishop industrial hygiene audit was conducted October 25-26, 1984. Mark Stenzel and Bill Adams conducted the audit and were accompanied by Gary Ille and Chuck Gary. The scope of the audit was to review compliance with government and company policies and procedures as well as good industrial hygiene practices.

An overall summary of the audit findings is that Bishop does have an adequate industrial hygiene program in most areas, but more emphasis should be put into the areas of training and documentation.

The audit team appreciates and acknowledges the effort that went into compiling the audit information as well as the time allowed for the plant tour. We feel it is appropriate to comment on the following areas which are important and which appear to be extremely well-covered by Bishop's industrial hygiene program or have required a considerable effort by the program.

- Bishop has spent considerable time and effort on special studies, including the following.
 - Bishop Mortality Study
 - National Cancer Institute (NCI) Mortality Study Relating to Effects of Formaldehyde Exposures
 - Company Pulmonary Function Morbidity Study (which evaluated the effects of formaldehyde exposure on employee health)
 - NIOSH Study (which was intended to evaluate the effectiveness of engineering controls related to formaldehyde)
- Well-organized and written sampling strategy.
- Review of Purchased Materials (Celmis) appears to be working effectively.
- A very significant effort has been exerted by Gary Ille to insure the integrity of the zone tracking data.

009515

Below are listed findings for your review and consideration.

● Finding 1-84

No written emergency plan is in place regarding carbon monoxide (CO) release in the methanol synthesis (MS) unit.

Discussion

The unit does have an area monitoring system and several other types of equipment to warn individuals of high CO levels are being investigated, but an written plan does not exist regarding what to do if an alarm goes off or what to do if an individual is overcome by CO gas.

● Finding 2-84

The industrial hygiene function has little involvement in abnormal occurrences and is not properly documenting who and what materials were involved.

● Finding 3-84

Not all interpretive statements contain all the key information, including appropriate PELs or TLVs, a summary of the health hazard associated with the material(s) being monitored, the exposure levels, an interpretation of the data and an action plan if the data indicates that exposure levels may be too high.

● Finding 4-84

Regularly scheduled IH walk-throughs are not conducted by the facility IH function for the purpose of hazard recognition.

● Finding 5-84

The plant does not have an overall industrial hygiene administrative procedure or a procedure covering the sections of TSCA, including 8(c) and 8(d).

● Finding 6-84

The plant has not been training employees on a yearly basis in the areas of noise and TSCA 8(e).

009516

Discussion

Other areas where training is advisable, but not legally required, include respiratory protection, carbon monoxide, health monitoring.

- Finding 7-84

*SOP
to monitor
prepared and to be kept*

No regularly scheduled measurements or inspections are conducted on unit laboratory ventilation hoods.

- Finding 8-84

Done

A few individuals have not yet been fit-tested to wear respirators.

Discussion

The facility has had a consultant test most of the individuals.

- Finding 9-84

Done

Several inconsistencies were observed regarding the documentation of industrial hygiene samples.

Sample was collected: for some reason it was never analyzed. Should specify if it broke so we don't test for it later

Discussion

The problem relates to missing samples or samples that failed.

- Finding 10-84

*NOT Done.
Need Brenda
to assist.
Need schedule
when she's
free.*

The audit check on automatically generated zone tracking data was not being conducted.

Discussion

The data obtained from exposure cards looked good, but some of the automatically generated data were incomplete.

- Finding 11-84

Done

The calibration and quality assurance techniques associated with monitoring should be thoroughly reviewed to insure that accurate data are being collected.

● Finding 12-84

Not to put
out letter to
units/copy
manager

The high noise lines in some areas of the plant need re-painting.

● Finding 13-84

Done

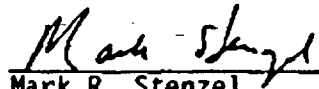
The permissible exposure level for noise is not in the computer.

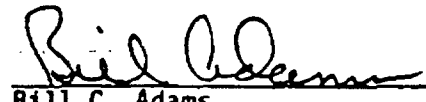
● Finding 14-84

Done

The time-weighted average (TWA) designation must be expanded in the computer to allow for samples which are longer than a short term sample but shorter than a traditional 8-hr., TWA.

Bishop's first progress report on the findings should be submitted within 30 days of the receipt of this report. Thereafter, quarterly progress reports should be submitted until all findings have been resolved.


Mark R. Stenzel


Bill C. Adams