

# Interoffice Memorandum

|                          |                       |               |                   |
|--------------------------|-----------------------|---------------|-------------------|
| TO (Name and Location)   | *As listed            | DATE          | February 27, 1984 |
| FROM (Name and Location) | Bruce T. Bowyer - NYO | REFERENCE NO. | BTB-16-84         |

Subject: Corporate Industrial Hygiene Audit  
of the Bishop CCC Facility  
December 5-6, 1983 - Final Report

An industrial hygiene audit of the Bishop CCC facility was conducted on December 5 and 6, 1983, with the following participating in the audit team:

Bruce Bowyer - NYO  
Wendell Brough - Bishop  
Gary Ille - Bishop  
Vince Parrillo - Chatham  
Joseph Stelluto - NYO  
Mark Stenzel - Dallas  
Don Unruh - Louisville

Although the audit was a comprehensive review of the facility industrial hygiene program, the audit report is an exception report which addresses only those areas requiring attention. Those elements of the industrial hygiene program not mentioned were found to be acceptable. The findings which require further action are as follows:

1. Some aspects of the respirator program are inadequate and need to be reinforced as evidenced by the following:
  - a. Improper storage of respirators in the Paraform bagging area.
  - b. Lack of use and improper use in the Paraform and Paraform bagging area.  
  
(Note: Between the sampling phase of the audit and the final audit, a Paraform Respirator policy was implemented).
  - c. Although quantitative fit testing was attempted, because of technical problems with the fit testing apparatus, fit testing is not being done on all employees required to wear negative pressure respirators.
  - d. Defective respirators were found in the OXO unit.

2. A facility Industrial Hygiene QC program to assure uniform application of validated sampling and analytical procedures and methods is not being provided.
3. Functional guidance for Industrial Hygiene sampling and analysis to assure integrity of data is not being provided in all cases by the Industrial Hygiene professional.
4. Although previous plant particulate data indicated no problem in this area, one total particulate sample measured in the Triphenyl Phosphine loading area by NATLSCO indicated a potential exposure problem with TPP.
5. Not all chemicals are cleared for purchase by SHE department as required by Bishop plant policy.
6. Industrial Hygiene walkthrough surveys by the Industrial Hygiene professional are not conducted on a regular and frequent basis to aid in recognition and hazard evaluation of current and changing operations.
7. Although the facility industrial hygienist issues an annual sampling schedule outlining the requirements for each quarter, a formal sampling philosophy based on the statistical need for monitoring in an area has not been developed.
8. Routine maintenance, inspections and air flow measurements of local exhaust ventilation systems are not being conducted on a routine basis.

Within four weeks of the date of this report, the Bishop CCC plant is requested to submit to the corporate audit team its corrective action plan for each of the above findings, with the name of the responsible person and a completion date for each proposed action. Any findings which have already been corrected should be identified in the action plan. The corporate audit team will promptly notify the facility of any difficulties or problems it sees in the proposed corrective action plan. The status of each action item will thereafter be reported in quarterly follow-up reports filed by the facility with the corporate audit team until all action items have been completed.

  
Bruce T. Bowyer

BTB:sl

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File  
CCC

Product Safety

BTB-16-84

February 27, 1984

Corporate Industrial Hygiene Audit  
of the Bishop CCC Facility  
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\* [REDACTED] Dallas  
W.H. Brough - Bishop  
J.J. Fritsch - Bishop  
P.E. Hime - Dallas  
B.A. Melaas - Dallas  
W.H. Meyer - Bishop  
D.G. Olgivie - NYO  
G.A. Rodenhausen - NYO

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