

Aeroffice Memorandum

TO (Name and Location)	J. F. Stelluto - New York	DATE	May 3, 1982
FROM (Name and Location)	M. R. Stenzel - Dallas 2	REFERENCE NO.	MRS-47-82

Subject: Industrial Hygiene Monitoring in Conjunction with
Corporate Industrial Hygiene Audit Program

As you are aware, one of the major changes in the Corporate industrial hygiene audit program is the inclusion of industrial hygiene monitoring. It is my understanding that the purpose of this monitoring is to simulate the monitoring associated with an OSHA inspection. Other benefits such as an identification of problem areas or characterization of true exposure levels would be very limited because of the short time available for the audit.

Because monitoring is a new feature of the audit, some uncertainties exist. For example, if in parallel sampling all the results agree, obviously no problem exists. In contrast, if the numbers are different, the audit team needs a way to identify the source of the problem.

I know of no way to avoid discrepancies, but do have several suggestions which may be useful to resolve the discrepancies if they occur.

1. Inform the plant of what you plan to monitor at least a week before the audit. The Plant will then be prepared to collect parallel samples. Parallel sampling will provide the audit team a mechanism to determine if a discrepancy exists between the method used by Celanese and the consultant or if the area being sampled is different (upset condition, etc.) from previous monitoring situations.
2. For each contaminant you choose to monitor, collect at least three samples in various locations in the Plant. This suggestion will reduce the possibility that a fluke situation (pump failure, individual in major upset condition, etc.) would influence the audit procedure.
3. Each of the Celanese Chemical Company Plants have an air standards generator which can generate standards traceable to NBS standards. I would suggest that for each contaminant monitored at least two samples be collected, by the Plant and the consultant, from the generator. This suggestion would provide for the direct comparison of the methods under known conditions. If there are problems with calibration, sample stability, etc., this suggestion would identify the problems.

I believe that these suggestions will improve the benefits of the audit program for the Plant, Company and Corporation.

Mark

Mark R. Stenzel

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