QUESTIONS FOR OSHA AUDIT

References: OSHA Regulation 1910.1017 Vinyl Chloride
OSHA Regulation 1910.134 Personal Protective Equipment -- Respiratory
BFG Eng. Std. ST-404.6 Revision #11-8-75 Breathing Air Supply

1. COMPLIANCE STAFFING - written reply

   1. Person in charge now -- long term - Ron -
   2. Reports to whom
   3. Describe organization and coverage
      Howard - Phil - Earl - Fannin
   4. How much back-up is given by: Plant Nurse, Safety, Personnel, Production Departments

2. REGULATED AREA

   1. Define area
   2. Where are precaution signs posted
   3. How do you control access - possible dot program - Label - area Lake
   4. How are daily rosters filed
   5. ~~Plans~~ Maps for deregulation
   6. Should roof area be regulated - Jim - need info to determine
   7. When do you plan to deregulate stairwells -- other areas.
      control rooms, lunchrooms & Howe

3. PERSONAL MONITORING

   1. What is purpose of 6-hr. monitoring, of 15-minute. data to show the accuracy requirement is being met.
   2. Show historical record of exposure, also current level. What hazardous operation monitoring frequency is used.
   3. Show your personal monitoring cards -- signed -- how filed -- retention time -- card summary file.
      SHOW

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Ron
4. Are lab chromatograms filed.

JDF
5. How frequently is the G.C. calibrated -- what gas.

JDF
6. How are the air pumps maintained -- who is responsible -- what is your experience with pumps.

JDF
7. What air flow rate is used for long term (6-hr.) monitoring; what break-thru is allowed on the back-up tube.

JDF
8. What is air flow rate for short term monitoring.

Ron
9. How many employees are being monitored now. 447

Ron
10. For what job tasks do you require respiratory protection. enforcement Hazardous operations copies

JDF
11. What job task monitoring has been done for 5 ppm ceiling.

~~12.~~ What test accuracy and pump accuracy data do you have to demonstrate monitoring accuracy requirements are being complied with.

12. What are results of monitoring with regard to use of respirators, either inside or only when mask is off

4. RESPIRATORY PROTECTION

Rum Rum
1. What is covered in your written Respiratory Protection procedure.

Rum
2. How often are what employees instructed in responsibilities and need for wearing respirators.

Rum
3. What cleaning facilities are available.

Rum
4. Are respirators assigned to individual users. Where are they stored between uses.

Rum
5. How often are they checked for deterioration and by whom.

Rum Rum
6. Any observance of employee stress in wearing this protective gear.

Rum Rum
7. How many breathing air stations on each floor -- what is greatest distance between -- what is length of hose supplied.

Rum
8. How would you handle a maintenance team of several men at one station.

JDF
9. Is breathing air G.C. analyzed -- when will it be -- what is done if 0.5 ppm AVCM is recorded.

Rum
10. Where is 5-minute reserve supply reservoir located.

Rum
11. How is breathing air conditioned before supplying user.

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12. Is activated carbon used anywhere in breathing air system.
13. What is your mask day experience. - % time of mask on
14. What are the continuous VCM monitoring alarm levels now -- future.
15. Is the breathing air mask coupling used elsewhere in the plant.
16. How many Scott air pacs are provided -- have they been converted to pressure demand type.
17. What are plans for use of cannisters if worker mobility is necessary.
~~18. What data do you have on AVCM measurement inside respirator.~~

5. HAZARDOUS OPERATIONS

1. List your hazardous operations.
2. What is your procedure for all types of protective equipment usage in hazardous operations -- hard charge -- liquid VCM leak -- dirty poly entry -- other maintenance job.

6. METHODS OF COMPLIANCE

1. See attachment A for detailed questions.
2. List of projects to reduce level to less than 1 ppm -- completion dates.
3. Dates for updating written plans on 6-month frequency.

7. CONTRACTORS AND VISITORS

1. What is plant policy involving contractors in regulated area -- how train contractor employees -- respiratory supply -- record keeping.
2. Visitor policy for other than authorized personnel.

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8. EMERGENCY SITUATIONS

RLM 1. Written emergency procedure for regulated area. check with Earl – check with Dean & Bob

DEAN, BOB, RLM 2. Relate to written Evacuation Procedure — evacuation alarm -- head count -- assembly area. Dean + Bob, emergency earth

3. What if assembly area is in path of VCM emission.

RLM 4. What signal is used for each type of alarm. local - plant wide

9. TRAINING

RLM 1. Records of required annual training, quarterly training.

RLM 2. New and transferred employee indoctrination and training -- materials and records.

RLM 3. Included in annual training -- carcinogenic hazard -- protective steps -- respiratory equipment -- fire and toxicity -- monitoring need -- medical surveillance -- emergency procedures -- recognition of VCM release -- OSHA standard review.

10. MEDICAL SURVEILLANCE

RLM 1. Annual exams, 6-month exams, upon removal from regulated area.

RLM 2. Is employee provided with copy of suitability for exposure to VCM upon completion of examination -- within 4 weeks. check with Norm - 3 sample letters pg 8 of directive 7-1-75

RLM 3. Policy if employee declines medical exam or is otherwise non-cooperative.

11. SIGNS AND LABELS

RLM 1. Hazardous operation sign. - update - beacon lights

JDF 2. PVC waste labeled. dumpster labeled

ERC 3. Product labeling.

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12. RECORDS AND REPORTS

1. Personal monitoring records -- employee notification notices.
2. Medical records.
3. Authorized personnel rosters.
4. Notification of changes in regulated areas.
5. File of massive release reports.