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INTERNAL CORRESPONDENCE

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CHEMICALS AND PLASTICS

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OSHA INSPECTION
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L. A. CRISORIO

TO (NAME)
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See Attached
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L. A. CRISORIO

COPY TO

Mr. H. R. Schulz

SUBJECT

Followup Inspection by OSHA
Industrial Hygiene Compliance
Officer

Gentlemen:

The attached summary by H. R. Schulz describes the followup visit of OSHA to the Texas City Plant on January 8, 1979. The inspector, Mr. Richard Miller from OSHA's Cleak Lake office, is very thorough and determined to get all available facts; but he privately admits that it would be impossible to prove any connection between the workplace and known cases of brain tumors. If you have questions or desire more information, please contact Mr. Schulz. Your comments/suggestions are solicited.

Yours very truly,

J.B. Levert
J. B. LEVERTON

JBL:lr
Attachments

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**UNION
CARBIDE**

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77390

T (NAME) Mr. J. B. Leverton
COMPANY
LOCATION TEXAS CITY PLANT

DATE January 11, 1979

SUBJECT Followup Inspection by OSHA
Industrial Hygiene Compliance
Officer

Dear John:

On January 8, 1979, Mr. Richard Miller, OSHA Industrial Hygienist, revisited the Texas City Plant to perform Industrial Hygiene personnel sampling at the Building 19, In-Plant Distribution Drumming Room. This was done as followup to his inspection on December 13, 1978, which, as you know, was initiated by an employee complaint. Mr. Miller stayed at the Bldg. 19 Drum Room for the entire day and was continuously escorted by plant personnel.

Mr. Miller placed carbon tube personnel samplers on five Product Handlers in the Drumming Room. These were:

1. Mr. Anthony Fortini -- Product Handler -- filling drums on the #1 and #2 drum line.
2. Mr. J. J. Trotter -- Chief Product Handler -- Supervision and working empty drum line/stenciling and labeling.
3. Mr. H. Marcum -- Product Handler -- working empty drum line/stenciling and labeling.
4. Mr. H. P. Kibbe -- Product Handler -- working empty drum line/stenciling and labeling.
5. Mr. E. Joiner -- Product Handler -- working empty drum line/stenciling and labeling.

Mr. Miller also placed a carbon tube area sample in the drumming area. During the sampling period, Butyl Carbitol, Anhydrol, Diethylene Glycol and Polyamine H were drummed.

All samples were started at 8:30 and were stopped at 3:45. Union Carbide Industrial Hygiene personnel co-sampled with Mr. Miller to provide replicate data. Our carbon tubes will be analyzed after Mr. Miller informs us as to what contaminants he is going to analyze the OSHA samples for.

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Mr. Miller also spent considerable time sampling with detector tubes, most of which had no relationship with the chemicals handled in the Drumming Room. The list is long so I'll only point out that the list included chlorine, fluorine, hydrogen cyanide, vinyl chloride, acrylonitrile and ethyl acetate. The last two, acrylonitrile and ethyl acetate, showed slight positive stains; however, both were nondefinitive. His reasoning for sampling for so many gases was to qualitatively identify any interference gases that would show up on his laboratory's analysis of his carbon tube personnel samples. An interesting point of procedure is that he used an MSA Universal pump with Gastec detector tubes, a technique that OSHA has recommended against in the past.

Several photos were taken by Mr. Miller, all of which were replicated by our plant photographer.

The compliance officer took small bulk samples (10 mL) of all products being drummed as well as the drinking water, and an open bucket of solvent (MEK) in which the label glue pot was being cleaned.

Three product handlers were privately interviewed by Mr. Miller. These were Mr. A. Fortini, Mr. H. E. Whiting, and Mr. K. D. Rush. As usual, no information was disclosed about these interviews.

Before leaving Mr. Miller requested the work histories for Messrs. Bobby Hinson, Shelby Perkins, and Chris Brugmann. Hinson and Perkins are, I believe, two of the product handlers who died from brain cancers. I was not aware of any connection of Mr. Brugmann with this investigation until the request. I presume he obtained the name from his interviews.

A request was also made by Mr. Miller if we would provide him with any Diethyl Sulfate (DES) sampling data that we have taken or are going to take. He also requested information about our sampling methods for DES. I informed Mr. Miller that I would have to seek appropriate counsel before releasing any of the requested information to him.

In our closeout conversation, he stated that there would probably be no further action until his samples were analyzed. He felt that there could possibly be additional sampling performed but was not sure. His asides to me indicated that the investigation was probably at a deadend and if there were some connection between the workplace and the known brain tumors, that it was some years ago, and current working conditions did not indicate any problems to him.

As we probably need to discuss several of the items mentioned, please contact me at your convenience.

Very truly yours,


HARVEY R. SCHOLZ

HRS:ir

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