

ATTACHMENT I

Memorandum of Organization

TO: (Name and Location)	DATE
** As Listed	December 19, 1977
FROM: (Name and Location)	REFERENCE NO.
JAMES M. RAMEY	JMR/603r2/77

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** H.B. Bartley, Jr.	E.L. Tejml	Dr. Lee Starr
D.W. Lodge	P.E. Hime	B. R. Miller
J.C. Martin	C.E. Steel	J. A. Bousquet
H.D. Medley	R.D. Damron	
H.L. Pilat	J.J. Fritsch	
E.N. Wheeler		
H.C. Wilson		



SUBJECT: ORGANIZATION FOR INDUSTRIAL HYGIENE AND TOXICOLOGY

This memo will summarize organizational relationships and responsibilities for the industrial hygiene and toxicology function. This organization is consistent with the development of this function at the Corporate level and Chemical Company needs. Its effect upon specific persons will require individual discussions.

Each plant needs to clearly define areas of responsibility in the safety and industrial hygiene areas to make the organization work. Several features of the organization are:

1. The industrial hygiene and toxicology functions at the Company level will be retained within the Manufacturing organization. The title of my position will be changed to Manager, Industrial Hygiene and Toxicology to more nearly reflect the scope of the job, and will report to the Director, Manufacturing Administration. The Company Industrial Hygienist position will remain unchanged. I will coordinate company activities with the Corporate Director of Health and Environmental Affairs and his staff.
2. Conventional safety is retained within the Industrial Relations Department at the plant. The responsibility for hearing conservation and heat stress will also be retained within the Industrial Relations (Safety) Departments.
3. The responsibility for industrial hygiene and toxicology at the plant will be assigned to the Technical Department and more specifically to the Industrial Hygienist. My recommendation is that the position be filled with only certified Industrial Hygienists or experienced personnel with a degree in one of the sciences, who have stated a career preference for the field of industrial hygiene. The latter should be limited to those who in our best judgement can and will undertake a comprehensive self-study course designed by the Company Industrial Hygienist and scoped to prepare an individual for "core" certification by the American Industrial Hygiene Association within approximately 18 months.

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Since it is difficult to hire certified Industrial Hygienists, we will probably end up training our own at most locations. This will require that we build some flexibility into the position and reporting levels at the plants to accommodate variations in the incumbents' experience levels and meet local needs. Persons assigned to industrial hygiene positions typically will come from the technical organization. These persons will have available to them progression up the technical hierarchy as do other technical personnel. Titles will be comparable except the specialty in industrial hygiene will be noted, as follows:

- Associate Industrial Hygienist
- Staff Industrial Hygienist
- Senior Industrial Hygienist
- Industrial Hygienist II
- Industrial Hygienist I

The Company Industrial Hygienist will provide functional guidance to local personnel. The Corporate Industrial Hygiene group is also available for guidance and should be copied on all pertinent correspondence in this area.

The scope of the positions will include all areas fitting the broad definition of industrial hygiene with the exception of hearing conservation testing and heat stress. This would include:

a. Environmental Monitoring in Workplace

- . establish sampling priorities in concert with other plant departments
- . develop sampling and analytical procedures to support program
- . interpret results of tests
- . recommend corrective action or participate in design of administrative or engineering controls

b. Hazardous Chemical Control

- . perform industrial hygiene review of all new chemicals being introduced in the plant
- . maintain complete hazard and toxicological information on all chemicals used in the plant to include safe handling procedures and coordinate with other departments emergency and first aid procedures
- . implement hazardous chemical labelling system covering process, maintenance, and construction chemicals. (This will be held in abeyance until OSHA requirements are defined and a company system is established)

c. Medical Surveillance

- . identify all jobs in plant where exposure to airborne contaminants require medical surveillance
- . assist the Division Industrial Hygienist and Corporate Medical Department in grouping job assignments according to a common or similar exposure profile.

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- . have prime responsibility for providing input of industrial hygiene data to system
- d. Compliance / OSHA and TOSCA
 - . responsible for ensuring that plant management understands requirements for compliance with TOSCA and with exposure limits to airborne chemicals mandated under the OSH Act
- e. Training
 - . assist the Safety Department in employee training and notification of exposure

There will (and should be) many areas of cooperative endeavor between the Industrial Relations Department and the Industrial Hygienist. This is probably an oversimplification, but functions which relate to employee involvement and require a high degree of people skills should logically fit in the Industrial Relations Department. This would include conventional safety, medical examinations, training, notification and counselling on work exposure, record keeping, etc. Functions requiring a high degree of technical competence should be the responsibility of the Industrial Hygienist.

4. It is essential that the Industrial Hygienist and the Environmental Maintenance Coordinator be assigned to the same department (Technical) due to the interrelationships and overlaps which exist, particularly in the areas of analytical techniques and air emissions from point sources and fugitive losses.
5. An additional position is added for Industrial Hygienist, Analytical Services. This position already exists within CCCTC under another title but will be moved permanently to the Industrial Hygiene and Toxicology Department reporting to me.

The importance of the Industrial Hygiene function will continue to grow in the future. With current OSHA trends, we will reach a point in time where hundreds of personnel and area samples for airborne contaminants will be required each month. The only way this can be accomplished in a reasonably efficient manner is to have a qualified Industrial Hygienist at each plant to coordinate the program.

An organization circular will follow. You should discuss organization relationships and responsibilities with the involved personnel.

JMR/to

cc:

D. Collison - C.L.
W. Harrison - B
D.H. Miller B.C.
P. Turek - P

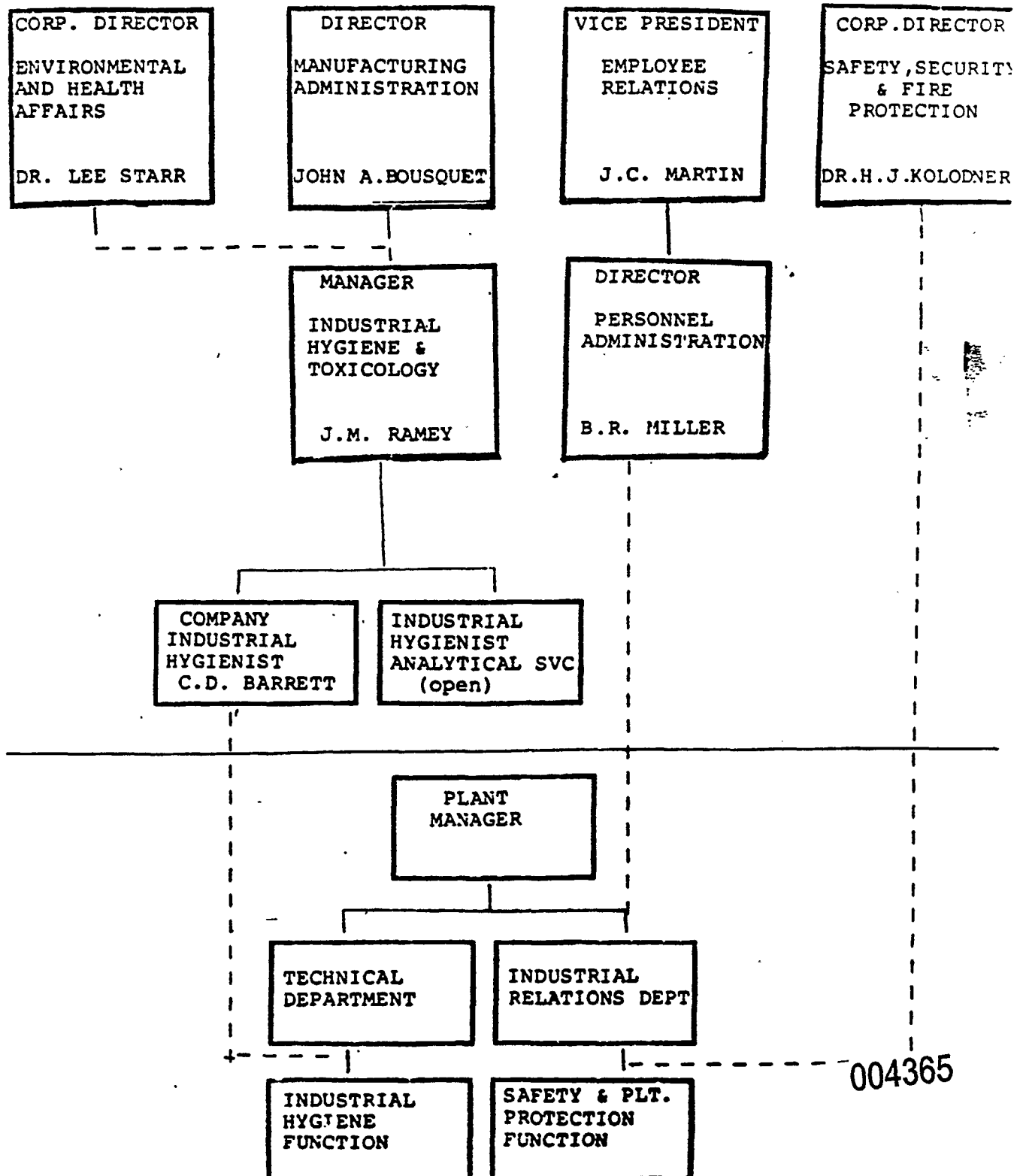
L. Hackfeld - B.C.
D. James - P
J. Bruner - C.L.
A. Miller - CC
B. Swanbeck - B

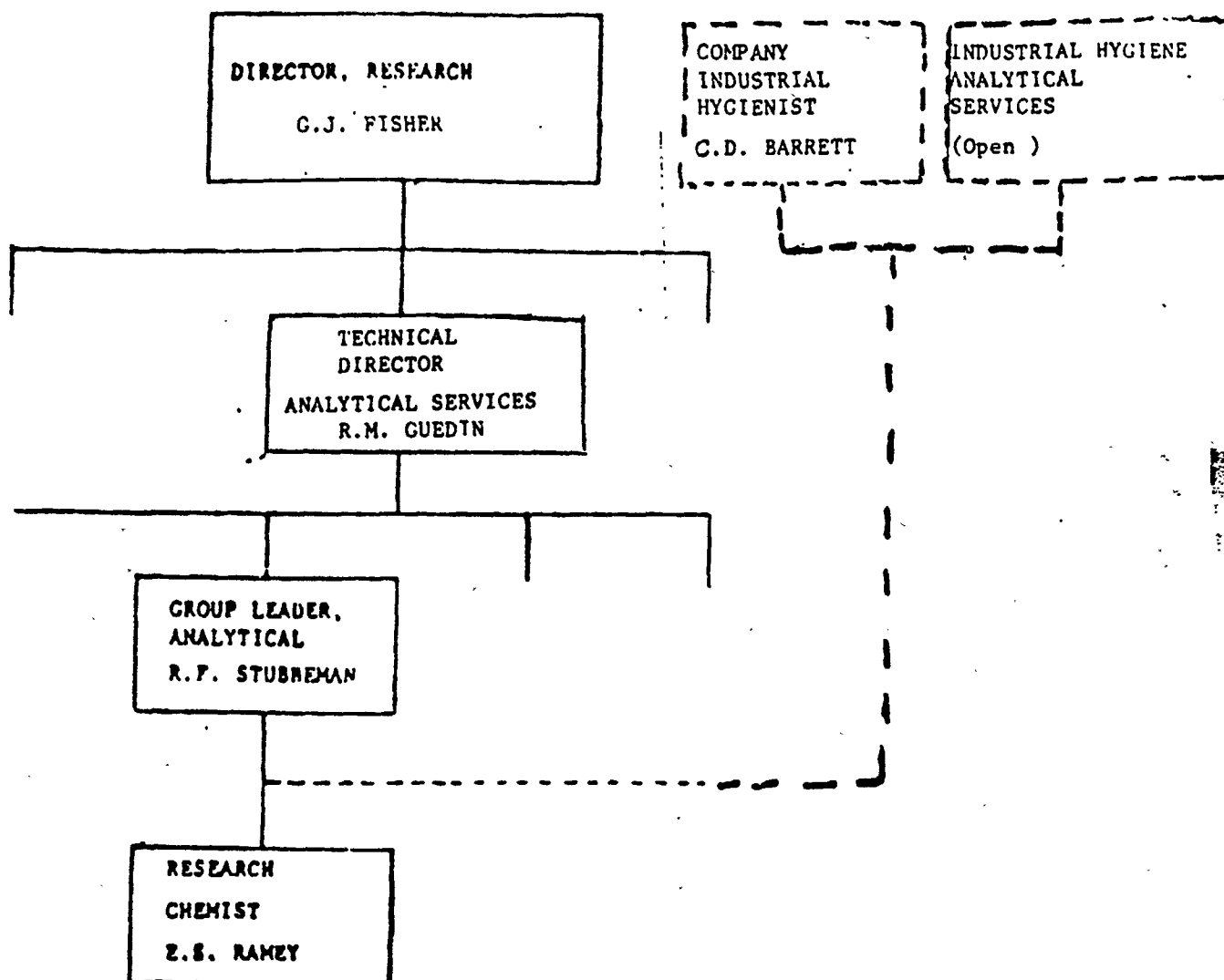
C.D. Barrett
R.D. Damron
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CHLORINE CHEMICAL COMPANY
ORGANIZATION

INDUSTRIAL HYGIENE AND TOXICOLOGY &
SAFETY AND PLANT PROTECTION





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