

BFGoodrich**INTER-ORGANIZATION CORRESPONDENCE**

TO Dan Gleghorn	FIELD POINT OR DEPT. & BLDG. NO. OTB	DATE YOUR LETTER
FROM J. P. Griffin	FIELD POINT OR DEPT. & BLDG. NO. ALTC B/418	DATE THIS LETTER 06-19-90
SUBJECT		

ALTC INDUSTRIAL HEALTH AUDIT PROGRESS REPORT

We at ALTC appreciate the time you and Paul spent at our facility conducting the 1990 Health Audit. Many of these issues have been addressed in our Health, Safety and Environmental Forward Plan. As you will note, this plan is aggressively "Front End Loaded" with most of our activities scheduled within the next 2 years.

To keep you apprised of future progress, we will continue to submit action reports semi-annually.


Jim Griffin

JPG:drf
Gleghorn.jpg

cc: C.N.Bush
R.T.Krebs
R.J.Grahek
H.Waltemate
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S.C.Altan
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S.E.Williams
ALTC Managers

NGC 13224

AVON LAKE TECHNICAL CENTER
INDUSTRIAL HEALTH AUDIT
JANUARY 22-25, 1990

IH-1990-1

Engineering and/or maintenance efforts need to be directed to reducing noise in those areas/jobs with an eight-hour TWA exposure of 90 dbA or greater (100% dose) OSHA.

NOTE: Details of this effort must be documented.

(Although noise enclosures and other treatments are used, noise must be engineered out of equipment.)

Response

We do not have any eight hour time weighted averages >90 dba. To reduce exposure <85 dba, we have 2 projects currently that will provide enclosures for noise reduction. In addition, all ALTC capital projects are reviewed in regards to noise emissions >85 dba.

<u>STATUS</u>	
<u>X</u>	Completed
<u> </u>	In-Progress
<u> </u>	Incomplete

IH-1990-2

Personnel working at noise hazardous jobs must receive annual training which includes at least the following information (OSHA):

- a. The effect of noise on hearing.
- b. The purpose of hearing protectors, the advantage/disadvantage and attenuation of various types, and instruction on selection, fitting, use and care.
- c. The purpose of audiometric testing and explanation of the test procedures.

The past training program in your facility was not acceptable. Send me a copy of your program which you intend to implement in the 2nd quarter 1990.

Response

This program has been submitted and "at least verbally" deemed acceptable.

<u>STATUS</u>	
<u>X</u>	Completed
<u> </u>	In-Progress
<u> </u>	Incomplete

NGC 13225

IH-1990-3

Care must be exercised to insure a proper initial fit and correct use of all hearing protectors (OSHA). NOTE: With insert type hearing protectors (ear plugs), it is important that the ear canal be clear and free of impacted wax. The ears should be examined for impacted wax before plugs are fitted. If impacted wax is found, it should be removed by a nurse or physician. Any employee complaining of an ear problem should be referred to medical personnel for examination.

Avon Lake medical is qualified to handle, but fitting has not been done.

Advise when this program is being implemented during annual physicals.

Response

This program has been implemented during annual physicals.

STATUS

☒ Completed
☐ In-Progress
☐ Incomplete

IH-1990-4

Audiometric examinations must be provided for employees transferring to noise hazardous jobs.

Provide me a list of the Noise Hazardous Jobs you have developed and your implementation procedure.

Response

The evaluation process is completed semi-annually at the time of CMS update. A job code list for noise exposures >85 dba has been submitted.

☒ Completed
☐ In-Progress
☐ Incomplete

IH-1990-5

Jim Griffin is conducting walk-through audits of your facility. It is recommended that Bob Krebs establish a management walk-through program.

Response

This program is in place at a frequency of 1/month. We track the corrective action items through completion.

☒ Completed
☐ In-Progress
☐ Incomplete

IH-1990-6

Equipment in the Medical Department should have certification/calibration procedures and programs.

- a. Audiometer is okay.
- b. Spirometer receives a nurse check only. This instrument should be calibrated at least every two to three years.
- c. Develop a procedure to assure accuracy of the ERG unit.

Response

Re: Spirometer: per rep who sold & services our unit, "as long as the daily calibration is +1-3% no additional calibration is necessary".

Re: EKG: the cardiograph performs an automatic function test prior to each EKG. In addition, Hewlett Packard recommends that a service rep do a safety check every 6 months. Our machine will be due for service in June 1990.

☒ Completed
☐ In-Progress
☐ Incomplete

IH-1990-7

It is recommended that nurses be supported to attain certification as Occupational Health Nurses.

Response

Ruth Hines has attended the Fireman's Fund O.H.N. Certification Review Course March 29 & 30, 1990. Both nurses will be taking the exam in 1991.

☐ Completed
☒ In-Progress
☐ Incomplete

IH-1990-8

A Hazard Inventory for Chemical and Physical Exposures by Department and job must be completed. (Per BFG SH&E Policy). This will satisfy the first step in the 1989 PEL project.

Response

An inventory program called "Chem-Store" has been developed on INGVAX. Site inventory completion is scheduled for 8-1-90. Hazard inventory with risk identification will begin on 8-1-90 with completion by 1-1-91. Outside resources will be required. These resources are under current evaluation.

☐ Completed
☒ In-Progress
☐ Incomplete

IH-1990-9

An annual review, update and goals projection for Job Hazard Exposures is necessary.

I reviewed some of the draft documents Steve Williams has prepared and they look very good. Please send me copies of these reports.

Response

As of 1-1-90, these reports have been generated on a quarterly basis and your name is on the distribution.

☒ Completed
☐ In-Progress
☐ Incompleted

IH-1990-10

Review your Hazard Review and Use Process and Committee structure.

Advise where you wish to modify either the procedure or committee structure.

Response

A proposal has been submitted for a risk indexing committee. I have attached that proposal for your review.

☐ Completed
☒ In-Progress
☐ Incomplete

IH-1990-11

Vinyl chloride training has to be more than giving an employee a report and having them read it. This was the previous approach in your facility.

Provide me a copy of your new training criteria and implementation program.

Response

Our new program has been submitted. The fire brigade and emergency response team was trained in April 1990. Personnel assigned to the VCL regulated area are scheduled for training on . Miscellaneous personnel such as maintenance are scheduled in June. Please note that this training does include testing to ensure that learning has taken place.

☒ Completed
☐ In-Progress
☐ Incomplete

NGC 13228

IH-1990-12 Send me your training criteria and implementation program for lead.

Response

Our personal and area monitoring was inconclusive due to a lack of data. We will complete the necessary monitoring in early 3rd quarter 1990. Training will be based on exposure potential and effected personnel.

NOTE: Our initial hazard identification indicated very low exposure, primarily due to the use of liquid lead mediums.

_____ Completed
☒ In-Progress
 _____ Incomplete

IH-1990-13 Submit your strategy to comply with the OSHA PEL's.

I know you are working on this project. I would like a step-by-step strategy.

Response

This program has been submitted and agreed acceptable.

☒ Completed
 _____ In-Progress
 _____ Incomplete

IH-1990-14 Provide me with your criteria and implementation program for Respiratory Protection Training.

Response

We have not settled on the best way to train in this area. Options are either to include, with our fit testing program, a training video covering respirator protection, or provide several group training sessions on an annual basis. Due to the increasing number of training requirements, we are leaning towards combining this with the fit test. Our goal is to finalize by 8-1-90.

_____ Completed
☒ In-Progress
 _____ Incomplete

IH-1990-15 Provide me with your criteria and implementation program for Respirator Fit Testing.

I know testing is being scheduled for February 22, 1990. Please advise its completion and your future implementation plan.

NGC 13229

Response

Qualitative fit testing has been completed for the ~90 employees at ALIC identified as "requiring respirator protection as part of their job description". Fit testing is now scheduled on their annual physical data sheet. Job codes requiring respirator protection have been identified.

☒ Completed
☐ In-Progress
☐ Incomplete

IH-1990-16

Medical Examinations for Respiratory Protection must be performed in accordance with BFG Occupational Health Policies, Section 1.17, except that OSHA (1910.134) requires re-examination annually.

A new OSHA standard is in draft form and will probably be published later this year which will make Respiratory Protection requirements more demanding.

Provide me with your criteria and implementation program for Respiratory Protection Medical Surveillance examinations.

Response

The Safety Department has provided the dispensary with a list of people who wear respirators. Their names have been added to our annual physical list. They will receive annual pulmonary function tests and respirator fit tests.

☒ Completed
☐ In-Progress
☐ Incomplete

IH-1990-17

Review environmental monitoring results to determine jobs that have unexpected non-compliant exposures.

Some monitoring results indicate non-compliant exposure without protection.

Advise me how you intend to handle this situation.

Response

My review indicates that these "non-compliant" exposures without protection are all in the VCL area. Attached is our new follow-up form that will assist in documenting exposure reduction practices. In addition, we are conducting task monitorings to better identify respirator required tasks.

☒ Completed
☐ In-Progress
☐ Incomplete

IH-1990-18

Labels indicating ventilation systems rating or flow-rating should be posted on the lab hood or equipment.

Response

Current labels indicate the following information:

HOOD PERFORMANCE RECORD

This hood has been inspected in 19_____

Test procedures, methods, formulae, instruments used and results
can be obtained through the Safety and Health Department.

1991 labels are as follows:

HOOD PERFORMANCE RECORD

This hood has been inspected in 19_____

Average Face Velocity _____ fpm

Test procedures, methods, formulae, instruments used and results
can be obtained through the Safety and Health Department.