

Monsanto.

PLAINTIFF'S EXHIBIT

MON-497

FROM
(NAME-LOCATION-PHONE)

Dept. of Medicine & Environmental Health

S. D. Paul - G2WB

4-8835

February 7, 1986

J. L. Henshaw - G2WB

SUBJECT: TEXAS CITY

REFERENCE: WBP Verbal Request of 2/5/86

TO: W. B. Papageorge - B3NA

In response to your request, the attached information is submitted which identifies issues, categorizes them by requirement, defines how to determine baseline for each issue, and establishes Monsanto positions.

In addition to stated positions, it is critical that we have access to people in the Texas City Plant to assist us with future information gathering and understanding some aspects of our Texas City files. *

If there are questions, please contact me.


S. D. Paul

/ph
Attachment

LAM026380

SDP273

STG 2405741

ISSUE	TYPE OF REQUIREMENT	HOW TO FIND BASELINE	POSITION
1. Benzene Standard	Proposed and future compliance	Evaluate IH monitoring data. Compare with 1 ppm TWA standard.	Work is needed in ethylbenzene and styrene to reduce personal exposures to benzene. <i>(could collect)</i> Cost is unknown.
2. Hazard Communication	On a compliance schedule	Discuss with Mary Caban at Texas City. Progress is excellent. Also conduct IH program evaluation.	Current position for compliance is excellent. Some problems getting MSDS's from suppliers which meet regulatory requirements. Not a significant concern. <i>0.1 Target</i>
3. HMM Concerns	Corporate Policy	Consult with Plant Manager or Will Varnado <i>new tanks in NH3 bullet retire in place - remove piping.</i>	We have evaluated the plant with an eye to Bhopal. There are no eminent dangers, but work is being done to minimize risk of such an event as it relates to a few plant materials. Status of projects not known. May be a significant concern.
4. Acrylonitrile Standard	Needed for compliance today	Check with Mary Caban and conduct IH program evaluation. <i>Contract QFT.</i>	Compliance is generally excellent. Quantitative fit-testing of respirators may not be done at an acceptable frequency (semi-annually).
5. Asbestos	Needed for compliance today	Check with Mary Caban and conduct IH program evaluation.	Compliance believed to be excellent. There may be lawsuits pending, but current operating concerns are minimal, if any.
6. IH Monitoring Data (Hard copy and computerized)	Needed for compliance today	Check hard copy plant files and run computer outputs.	Computer data incomplete. Some data not entered. <u>Need</u> hard copy data for future use in problem solving.

7. GENS "MUSTS" ↓ HIGH ACTIVITY

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ISSUE	TYPE OF REQUIREMENT	HOW TO FIND BASELINE	POSITION
7. Employee Work History Data (includes hourly and salaried job classification codes--hard copy and computerized)	Corporate policy	Check hard copy plant files and run computer outputs.	Computer data incomplete and inaccurate. Need hard copy data to correlate employee with exposure to certain chemicals and to satisfy epidemiology needs. Entire Monsanto work history needed for each employee.
8. IH Sampling and Analytical Equipment	Corporate Policy	Inventory plant IH lab/work areas.	Need to define equipment in use during Monsanto ownership to verify monitoring methods/data.
9. Laboratory Notebooks/Other Records (e.g., monitoring methods)	Corporate Policy	Access lab notebooks and files.	Take a strong position! We need to document methods, calibration, validation, etc. to support data in the future. Our GLP and ALHA accreditation for the TC IH lab means these records exist and are valuable to us.
10. Training Records	Corporate Policy	Check operating departments, plant IH and personnel department.	Want documentation of training to defend ourselves in future litigation. Information to include trainer, trainees, date and content if available.
11. Plant Materials	Corporate Policy	Consult plant purchasing and the MEHI Materials Subsystem.	We have much of the information, but want a plant chemical inventory to verify the accuracy and completeness of the information. Low priority due to information we already have.

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ISSUE	TYPE OF REQUIREMENT	HOW TO FIND BASELINE	POSITION
12. Work Area-ID Information	Corporate Policy <i>Review table - for accuracy</i>	Inventory all processes ever operated at the plant with associated accounting cost center codes.	Most information available, but want a complete listing to verify accuracy and completeness of the information. <u>Wanted</u> to verify who could have worked where and when for future litigation and epidemiology work.
13. IH Monitoring Memos/Reports	Corporate Policy	Search IH and department files.	We <u>want</u> to be able to document that we communicated monitoring results to employees regularly. Needed for epidemiology and litigation. Fairly important.
14. Annual IH Status Reports (including monitoring schedules)	Corporate Policy	Check plant and corporate IH files.	We <u>need</u> to document IH monitoring program status through time. That is, what did we monitor for? Who was monitored? Etc. Supplements items 6, 8, and 9. <u>This is a must, but we have a lot of this information already.</u>
15. IH Program Evaluations (initial and all follow-ups). Includes plant responses to recommendation, action plans, etc.	Corporate Policy	Check plant and corporate IH files.	<u>Needed</u> to document all other plant IH program elements through time. We have most of this information, but need to be sure we have internal plant written communication about it.
6. Respirator Fit Testing	Needed for compliance today	<i>medical record</i> Plant files.	We <u>need</u> to know who was fitted for a respirator and if the person had medical approval to wear the equipment prior to fit testing. This protects us in future litigation.

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ISSUE	TYPE OF REQUIREMENT	HOW TO FIND BASELINE	POSITION
17. Written Procedures/ Elements Impacting or Part of the Plant IH Program (e.g., written programs for respiratory protection, hearing conservation, hazard communication, vessel entry, contractors, etc.)	Corporate Policy	Extract appropriate information from SMP's, Safety Manual and IH files. <i>P-Bulletin</i>	We want to document plant practices during Monsanto ownership to protect ourselves in future litigation.
18. Engineering Controls	Corporate Policy and Regulatory Requirements	Consult plant IH and department files. Also consult plant personnel.	We want to know the engineering controls used at TC to reduce IH exposures that were installed expressly for IH reasons. We also want monitoring data which shows their performance when the controls were in place.
19. IH Budgets	Corporate Policy	Search records.	We want to know our expenditure in people and money to maintain the TC Plant IH program over the years.

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