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Interoffice Communication

To John Friend

From Tom Grumbles

Date August 9, 1983

Subject INDUSTRIAL HYGIENE AUDIT OF ABERDEEN PLANT

The subject audit was conducted on July 28 and July 29 by Sid Pitts, Safety Director, LCCP, Louis Legendre, Corporate Industrial Hygienist, Ponca City, and myself. This was the second audit for the plant, the first being in November 1981. Emphasis was placed on reviewing the previous audit and actions taken on recommendations in that report. Following are the audit team's comments and recommendations.

All recommendations from the initial report have been substantially completed. Education programs have been updated where necessary and work is nearly complete on contractor education programs. The laboratory is now keeping "background data" from personal air sampling in accordance with the OSHA Records Access Standard. An exhaustive review of the fixed point monitors in the plant breathing air system was done and clerical errors corrected where found. A charcoal filter has been placed in the system to reduce the potential for organics contamination in the system. Personal samples are picked-up more often from the guard house and efforts have been made to increase awareness of the proper wearing of sampling devices.

The plant is to be commended for recent actions taken to involve department heads and other levels of supervision in the education, industrial hygiene, and exposure control programs. Procedural changes and efforts to identify exposure sources have resulted in an increased awareness of industrial hygiene concerns. As a result, vinyl chloride concentrations, as measured by the personal air sampling and fixed point systems are significantly decreased from 1982. The team strongly urges this effort be continued.

Plant hazard communication programs were reviewed in terms of compliance with what the OSHA Hazard Communication Standard is expected to require. Impact on the plant should be minimal with the existing programs and policies currently in place. The procedure of clearing purchases of new chemicals through the Safety Department, to assure proper hazard information is available, should be re-emphasized.

RECOMMENDATIONS

1. Several recommendations are made in the area of air sampling and analysis. Blind "blanks" are being inserted into the routine VCM analysis scheme to spot check laboratory quality control. To further establish a quality control program, I will work with the plant and a certified contract laboratory to develop a periodic analytical check. I should have a detailed proposal, including costs and sample frequency within two weeks.
2. The plant currently uses a REAL "Mini Monitor" for routine personal monitoring. This device appears to work well for the plant. However,

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it is not a device which has general use in industry. It is recommended that current state-of-the-art passive monitoring devices be evaluated by the plant. This was discussed at length during the audit, and I will assist in obtaining information for the plant.

3. Lead samples are analyzed in Ponca City. The plant should evaluate the costs of sending lead samples to a certified laboratory for analysis. At least, a quality control program similar to the one to be developed for VCM analysis should be developed.
4. Currently, the plant sampling scheme includes nearly random sampling of job classifications on a predetermined basis. It is suggested that an effort be made to sample particular tasks or short term jobs that are identified as having high exposure potentials. The logistical difficulty in doing this is recognized, however, this data will help evaluate the effectiveness of planned procedural or equipment changes for exposure control.
5. The written respiratory protection needs minor revisions as follows:
 - a. The standard reference should be changed from ANSI Z-88.2-1969 to Z-88.2-1980.
 - b. The policy should make reference to the Engineering Work Practice Control Plan for specific jobs or tasks and respirator selection.
 - c. Add a specific provision for routine screening of breathing air cylinders for Grade D quality.
 - d. Add a specific time frame or specification for checking quality of the breathing air charcoal filter.

The plant industrial hygiene program is in good order. The recommendations above are made in an effort to further strengthen the existing program. I would like to thank plant personnel for their time and attention during the audit.



Thomas G. Grumbles

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