



INTEROFFICE
MEMORANDUM

Date 27 April 1976

Subject AUDIT OF THE OSHA COMPLIANCE IN THE
ESCAMBIA PVC PLANT

To T. L. CAREY
From J. C. NOVAK

VALLEY FORGE
(Location, Organization, or Department)
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cc: J. T. Barr/Valley Forge
~~E. E. Jones/Escambia~~
A. K. McMillan/Valley Forge
E. A. Primeau/Escambia
R. E. Schenck/Valley Forge
W. J. Stueben/Escambia

An audit of the Escambia PVC Plant was performed on 20, 21 April 1976 to determine the degree of compliance with OSHA requirements.

The overall appearance of the plant is excellent. The construction on the north end of the plant distracts from the good impression; however, isolation is maintained between the construction area and the operating plant. This isolation is not consistently successful and it requires daily maintenance.

The respiratory protection program has been fully implemented. The responsibility of maintaining and issuing respirators was assigned to the Maintenance Department under F. Sommer. At this time, it is difficult to judge how effective Fred's efforts are in implementing the program. W. Stueben will follow-up and will assure that the program satisfies legal requirements.

The attitude of the employees at the Escambia Plant are similar to those at Calvert City. It requires consistent and continuous supervisory involvement to enforce the wearing of respirators above the one ppm concentration.

The alarm system for the Escambia PVC Plant consists of a single alarm at 1 ppm. The plant, at this time, has no considerations to expand the alarm system to 5, 100, and 1000 ppm VCM concentrations. Based on my interpretation as well as J. T. Barr's, such alarms are needed to comply with the law. This has been expressed by J. T. Barr in several of his past communications. The Legal Department will be contacted for an interpretation.

The monitoring and recordkeeping requirements are well implemented.

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I will follow-up the above items in my subsequent audits. I will also obtain a legal opinion from R. Schenck on the necessity of multiple level alarms.

J. C. Novak

J. C. NOVAK

JCH:hag

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