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TO: Charlie Miller, George Williams-Blane

FROM: T. G. Grumbles

DATE: March 30, 1989

Interoffice
Communication

SUBJ: BLANE OSHA HEALTH STANDARDS PROGRAM NEEDS

VISTA

This letter is to summarize our discussions regarding the status and needs of the plant's OSHA health standards compliance programs. Specifically while visiting the plant on March 15, 16 and 17, I reviewed the plant's programs in the areas of Lead, Respiratory Protection, Hazard Communication and Noise Conservation. The visit was not intended to be an industrial hygiene audit. It was a problem identification visit to begin the definition of actions necessary to assure the plant is complying with OSHA health standards. Below are my observations.

1. OSHA Lead Standard - The lead standard has numerous requirements that are currently not being adequately met. There has been a significant increase in lead dosimetry results over the last 12 months.
 - a. Air Monitoring - Air samples to determine employee exposures to airborne lead must be repeated on a specified frequency dependent on exposure levels. Blane's exposures require that quarterly monitoring be done. I have instructed Joe Goyette in sampling procedures and the quarterly frequency must be maintained until the measured exposures are reduced.
 - b. Fit-testing - Qualitative or quantitative fit-testing must be done every 6 months, or before an employee is assigned to a job requiring the use of a respirator. The best I can determine is that this hasn't been done for ten months and no one at the plant is trained on how to do the testing.
 - c. Education and Training - Employees must be trained annually or before assignment to the job, on the items specified in the standard. A slide-tape show is available at the plant to assist in accomplishing this. Training was due in March. Accurate records should be kept of the training. None could be found of previous training.
 - d. Written Compliance Program - The plant's current written program is deficient and does not meet the minimum requirements of the standard or adequately reflect the current status of exposure abatement programs.
 - e. Ventilation System Measurements - The standard requires that ventilation devices be evaluated every three months. No records of any evaluation in the last 18 months could be

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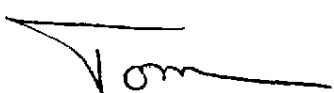
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describe what the practice will be. Records are insufficient to document the hazard communication training that has been done.

4. Hearing Conservation - The hearing conservation program needs to be documented in a written program. Noise exposures exceed permissible limits in many areas of the plant and enforcement of hearing protection device use and signposting of high noise areas must be improved.

As mentioned, the visit was not a detailed audit of the programs but a review of the basic needs for compliance. There is a tremendous amount of work necessary to get the occupational health programs to the point of meeting minimum requirements and being functional. This should be a high priority activity given the importance of sound occupational health programs at your operations.

Please let me know when you want to discuss problem solving of the items in this memo. We must work hard to reduce lead exposures at Blane and get your programs into compliance with applicable standards. Many of your problems are similar to those at Premiere in 1987-88, and we can use that plant's experience in developing solutions to your needs. I would suggest considering using the same consultant Premiere used to assist in revising your compliance programs.



T. G. Grumbles

dlj
cc: G. Draper, W. L. McClain
J. Goyette-Blane

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found. The proper functioning of local exhaust ventilation is the key to the plant's lead exposure control program. Recirculated air systems must meet very specific requirements. Building 8 has a recirculating system that does not meet the minimum requirements.

- f. Respiratory Protection Program - The standard requires that a written program be maintained in accordance with the general OSHA respiratory protection program, and specifies specific allowable respirators based on exposure levels. The written program at the plant does not meet the minimum requirements or accurately reflect current practices. Inappropriate, and inadequate, respirators were observed in use. A lack of training is obvious and no records reflecting respirator training could be found.
- g. Housekeeping - The standard requires that all surfaces shall be maintained as free as practicable of accumulations of lead and prohibits dry sweeping or the use of compressed air for cleaning.

Housekeeping is poor. Accumulation of dusts, most containing lead, are evident in most working areas. Brooms and "air lancets" are also evident in the work areas and should not be used.

We spent significant funds to improve local exhaust ventilation in Buildings 8 and 3, but lead exposures have increased the last 12 months. I believe this to be a result of poor housekeeping and cleaning methods.

There are other issues that must be addressed regarding lead exposures such as determining sources of lead in the control room of Building 8 and the maintenance of portable vacuum cleaners for lead cleanup.

2. Respiratory Protection Program - As mentioned in Item (f) above, the plant's written respiratory protection needs significant revisions to meet minimum OSHA requirements and adequately describe current practices at the plant. Specifically, the presence and use of SCBA's, allowable use conditions of respirators kept at the plant, and responsibilities for administration of the program must be addressed.
3. Hazard Communication - The plant's written hazard communication program needs significant revisions to meet the minimum requirements of the standard. Also, the description of procedures for MSDS review and distribution, and in-plant labeling procedures are no longer being followed. The procedures need to be reinstituted or the program changed to