

72.19

Interoffice
Communication

TO: Plant Managers
FROM: R. D. Gamblin
DATE: March 4, 1985
SUBJECT: RESPIRATORY PROGRAMS

cc: JWW, PLK, DWH, CRS, WFH,
AHS, JRW (Bill McNease), RAM

original: JF

AHS will review this w/me in the
conf room at 2 PM on Wed April 3.
There are many issues involved in here.
Please be at this mtg.

VISTA

Recent developments resulting from an OSHA inspection and citation in Oklahoma City have caused a review of our policies regarding facial hair. After detailed review, it appears we should adopt a policy which requires that no hair be allowed which prevents an effective seal of breathing air masks. The policy should apply equally to employees, contractors and vendors for whom exposure might reasonably be expected.

Please establish your in-plant program and have the program completely in place by mid-3rd quarter 1985. Please have your programs reviewed by legal, medical, industrial hygiene, and personnel as necessary to insure we have the essential elements in the programs prior to implementation. Please confirm implementation completion to this office in writing by August 15, 1985.


R. D. Gamblin

bh

cc: REL TGG NCF RVD

TO: R. D. Gamblin

CONFIDENTIAL

FROM: T. G. Grumbles

DATE: March 1, 1985

SUBJECT: RESPIRATOR FIT-TESTING PROGRAMS

Interoffice
Communication

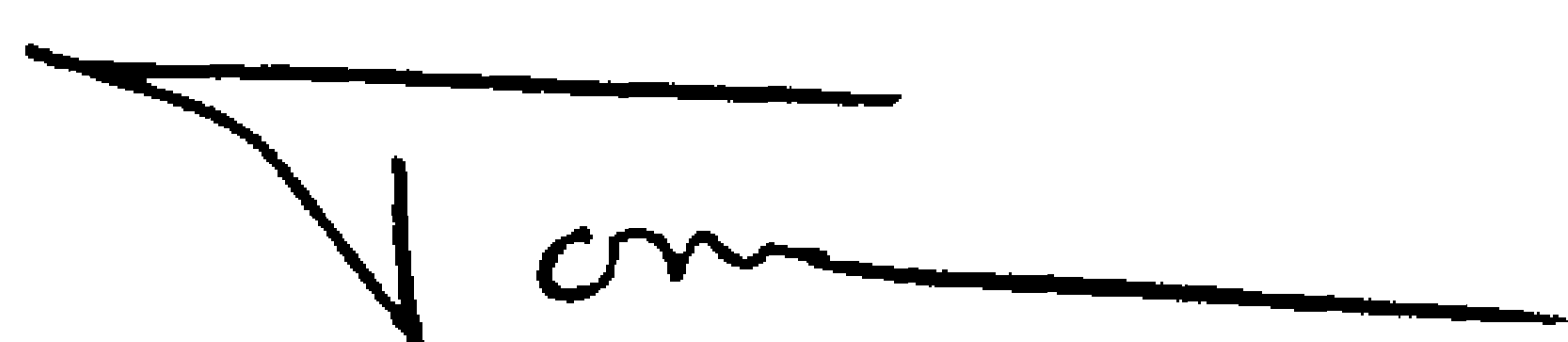
VISTA

As you know, we recently received an OSHA citation at the OKC Plant. As a result of that citation a formal settlement agreement was entered into, which obligated the plant to implement a respirator fit-testing program. This settlement agreement at OKC has potential impact on respirator programs at other Vista Polymers and Vista Chemical plants.

From a compliance standpoint there is a risk of OSHA alleging serious violations at other Vista facilities that do not have formal fit-testing programs utilizing "test atmospheres". These risks are discussed in detail in the attached memo from Bill McClain.

From a policy standpoint it had not been clear in the past what OSHA's stance was on fit-testing requirements when positive pressure equipment was used. As a result of this and the fact that our plants predominantly used positive pressure equipment, we have not emphasized "test atmospheres" fit-testing programs. In light of this citation we should evaluate our general operating philosophy and consider fit-testing programs at Vista facilities not currently using test-atmosphere protocols.

If programs are implemented, careful consideration must be given to the testing protocols to be used to assure that all possible benefits of the fit-testing program are realized.



T. G. Grumbles

bh

cc: W. L. McClain