1/23/74 - Copy to Dr. Ryan.

SUNOCO

SUN OIL COMPANY
INTER-OFFICE CORRESPONDENCE

DATE January 7, 1974

SUBJECT MINUTES OF SAFETY COORDINATORS' MEETING
TULSA, NOVEMBER 27/28, 1973

LOCATION Mfg.-Eng., Refinery Admin.

FROM J. M. Connor

TO. Messrs. J. R. Blackerby
K. Carr
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N. J. Neuhausel
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G. L. Van Valkenburg

PLAINTIFF'S EXHIBIT
SUN-255

RECEIVED
JAN 15 1974
J. M. HAAS

Attached are the minutes of the meeting in Tulsa, incorporating your comments on the first draft. I trust this set accurately reflects our discussions at that meeting.

JMC/mb
Attach.

SUN - 3720

S 0818

MINUTES OF SAFETY COORDINATORS' COUNCIL
NOVEMBER 27/28, 1973
TULSA, OKLAHOMA

I. Health and Environmental Health Services

A. Sun will continue to have a full-time Industrial Hygienist on the Employee and Environmental Health Staff (EEHS).

B. Sun will have access to contract hygienists. Assignment of tasks will be handled by Ben Tidball. Approximately 80% of two men's time will be required for 30 months.

C. The expense of the hygienists will probably be allocated by the Corporate office to the Group level.

D. The refinery will determine when the services of the Industrial Hygienists are required and to what depth the problem will be investigated. The EEH Staff Hygienist will outline projects to the contract hygienist when his services are required.

II. Recommended Policy for Refineries when Handling Asbestos Material

A. Contract Employees

Contract employees should generally be required to follow the same rules as Sun employees, although the prime responsibility for contract employees lies with the contractor.

B. Exposure Surveys

1. The group finds that exposure surveys on insulators and helpers involved in removing old insulation containing asbestos fibers shows that these men are occasionally exposed to concentrations in excess of the OSHA regulations. While no evidence of over-exposure has been shown during the job of installing insulation material containing asbestos, such exposure is possible if the material is carelessly handled.

2. The group finds that due to wind conditions, etc., it is difficult to predict precisely what exposure other employees in the vicinity might suffer but generally these people are not being exposed to excessive concentrations.

3. The group does not recommend further survey work except where special circumstances might indicate it is necessary such as where insulation material is being mixed or sawed.

S 0819

C. Use of Respirator Equipment

1. The group finds that much of the insulation material installed over the years has been of the type which contained asbestos fiber, and that positive identification of this type insulation is difficult under normal work conditions.

2. The group finds that monitoring of employees engaged in removing asbestos type insulation has shown that these employees may be exposed to concentrations of air-borne fibers which exceed the permissible exposure as set out in OSHA regulations 1910.93 (a), paragraph (6).

3. The group further finds that removal of non-asbestos type insulation may generate dusts or particles whose effect on the lungs is not known and should be avoided.

4. The group does not find evidence that removal of asbestos type insulation normally exposes persons (to concentrations approaching TLV limits) other than those immediately involved in insulation removal, handling, or disposition. Thus operators or other employees in the area are not normally exposed to excessive concentrations.

5. In view of these findings, the group recommends as follows:

   (a) All insulators, helpers, or other employees involved in removing or installing insulation not positively identified as being free of asbestos fiber be furnished, and required to wear, approved respirator protection.

   (b) All employees involved in collecting or disposing of used insulation material not positively identified as being free of asbestos fibers be furnished, and required to wear, respirator protection.

   (c) Employees involved in removing, collecting, or disposing of non-asbestos insulation material which emits a visible dust in the air, be furnished and encouraged to wear respirator protection as an added safety measure against the unknown effects of such dust.

D. Use of Protective Clothing

1. The group finds that there is evidence to show that asbestos fibers contaminate the employee's clothing when he is involved in handling asbestos type insulation material, and that this contamination can be carried home thus exposing other members of the employee's family.

2. The group finds that the only sure way to prevent the exposure described in (1) above is the use of protective outer clothing which will be left at the refinery at the end of each work day.

3. The group further finds that the neoprene or plastic impregnated paper coveralls which have been examined to date are generally unsatisfactory because:

   (a) Cost -- which could range from 80 cents to $2.00 per day per employee.

   (b) Uncomfortable -- due to the lack of ventilation and absorption of moisture.

   (c) Fire danger -- even though such garment is fire retardant it may melt and stick to the employee's skin, thus causing or complicating the treatment of burns.

   (d) Unserviceable -- easily damaged in contact with hot lines or other hot surfaces.

4. The group therefore recommends as follows:

   (a) The company should furnish and require the use of coveralls or other outer protective clothing to employees involved in the removal or otherwise handling of insulation materials, unless these insulation materials are positively known to be free of asbestos fibers.

   (b) The protective clothing recommended in (a) above should be made of cotton, wool, nomex fiber, or similar non-flammable, non-melting material which would provide reasonable comfort to the wearer and not subject him to additional dangers of heat stress during work or additional danger of burns during a fire.

   (c) The group further recommends that when an employee removes his protective clothing at the end of a day, that he place this garment in an impermeable bag or other container which can be sealed.

   The garment will then be laundered or cleaned.

The person or facility which launders the garment must be advised by appropriate tag that the garment (s) enclosed may be contaminated with asbestos fiber.

A written communication similar to that shown in Appendix A should be delivered to the agent performing laundry service on the contaminated garments.

E. Vacuum Cleaner Bath

1. The group finds that currently available foot covering presents a hazard to oil refinery employees while climbing ladders, etc.

2. The group further finds that the currently available head covering and gloves intended to protect workers against asbestos fibers poses problems. Wearing the hard hat makes the use of disposable head covering impractical. The use of disposable gloves was also considered impractical.

3. To provide protection against contaminating clean areas, the group recommends that a vacuum cleaner station be provided where employees can clean up their shoes, hair, and even coveralls before proceeding into uncontaminated areas of the plant.

F. Medical Examinations

1. The group finds that OSHA requires preplacement - annual - and termination medical examinations for those persons who are exposed to air-borne concentrations of asbestos fiber in excess of the TLV limits in the course of their work.

   Such examinations are described in OSHA Regulation 1910.93a, Par. (j).

2. The group finds that some employees such as mechanics or pipe fitters may remove small amounts of insulation prior to doing maintenance or repair work. Such an employee may have a limited exposure to asbestos fiber.

3. The group recommends as follows:

   (a) For employees who are exposed on their job to air-borne concentrations of asbestos fiber oftener than one day a week, the medical program called for by OSHA Regulations should be administered.

(b) For employees exposed on their jobs occasionally (one day a week or less) to air-borne concentrations of asbestos fiber, the full chest x-ray annually.

(c) Any procedure deemed necessary by the physician, regardless of exposure time, should be followed.

G. Educational Efforts

1. The group finds that an educational effort is essential to inform the employees as to why the company considers the protective program necessary.

2. The group recommends that a video tape be prepared as soon as possible covering the important aspects of this program. Such a tape would insure uniform instruction, widespread distribution of the information, and make the educational effort easy on the safety people involved.

The group feels it is essential that such a program be prepared before a major effort is made to enforce coverall rules. The respirator mask is considered to be immediately necessary and should not wait on a video program.

H. Other Measures

1. The group recommends that a separate locker facility be provided to insulation workers, away from the normal locker room, so that contaminated clothes can be removed at this point without the danger of spreading the asbestos fibers to their street clothes, or the street clothes of other employees.

2. The group recommends that asbestos type insulation scraps and debris be bagged and disposed of in land fill.

3. The group recommends that OSHA approved signs be posted in the area where asbestos type insulation is being removed.

4. The group recommends that consideration be given to roping off the area where asbestos type insulation is being removed, but does not consider this to be essential.

III. Safety During a Strike

A. John Naber discussed the lessons learned at Marcus Hook during the 1973 strike.

1. Four hours of safety training prior to assignment to operating units is considered necessary.

2. A six day week of 12 hours per day is considered better than the seven day week because of fatigue.

3. Lost time accidents during the strike were just about the same as the refinery average.

4. It is considered essential that the man in charge of safety security - fire not be assigned to operating units, but rather be kept in this critical area.

5. Assigning office people to long hours of guard duty subjects them to quite a few minor injuries due to blisters, fatigue, etc.

6. Well trained dogs can be useful in patroling large areas.

7. Extra contract guards were generally unsatisfactory because of the low quality of men provided.

8. Fire protection during the strike was better than normal because the firemen were living on the job.

9. T.V. cameras were very effective in documenting incidents to obtain injunctions.

B. Nick Neuhausel discussed the problems encountered in the brief Toledo strike in early 1973.

1. Getting trucks through the picket line is one of the most critical problems.

2. Escort for women going through the picket line is necessary.

3. Some method of preventing kites from being flown over the helicopter port is necessary.

4. The extra contract guards hired were all excellent, professional guards.

5. How to restore power, telephone, and water service quickly if interrupted must be studied.

6. State license laws as regard boiler and power machinery must be studied to be sure that supervisors can operate the plant.

7. Some scramblers on radios are important where security of conversation is necessary.

8. Reserve gates for contractors' use are necessary if construction work is to continue.

IV. Noise

A. The group finds that OSHA is near to publishing a new proposed noise standard, and that comments will have to be received and resolved before a final standard will be published. In view of the fact that such a standard will not be final before some time next year, the group finds that any recommendation to change what the company is doing at present would be premature.

B. The group recognizes that the dosimeter work which has been done might have to be repeated next year because the new standard will probably require dosimeter studies with "approved" instruments. In view of the fact that the labs which will be authorized to approve have not even been selected yet, it is impossible to determine whether our dosimeters will be on that approved list.

C. In view of the uncertainty in the new noise standard, the group recommends the following:

1. Continue audiometer testing of employees as we have been. Our instruments will very likely be approved, and our operators have valid certificates of qualification.

2. Continue dosimeter work to identify persons who may be exposed to more noise than 90 DBA for 8 hours per day.

3. Continue reasonable engineering measures which would bring noise levels to the 90 DBA level where employees have exposure of 2 hours or more per day.

4. Delay any major change in the noise program until such time as the new noise standard becomes effective.

V. Safety Goals for 1974

A. The group agreed to the following goals in 1974:

1. Reduce the frequency rate of all injuries and illnesses (first-aid, medical treatment, restricted duty and lost time) by 5% as compared to the frequency rate in 1973. Frequency rate is defined as all injuries per 100 employees per year.

$$\text{Frequency Rate} = \frac{\text{Total Number of Injuries and Illnesses} \times 100}{\text{Average Number of Employees for the Year (by months)}}$$

2. Reduce the frequency rate of lost time and restricted duty cases by 5% as compared to the frequency rate in 1973.

B. Each refinery will submit their plans as to how the goal will be achieved.

VI. Joint Labor/Management Committees

Gil Van Valkenburg discussed the present status of the committees. He described how they seem to be working, and the safety man's role in contributing to these meetings. He also discussed what to expect in 1974.

VII. Revised OI&I System

A. The revised form and instruction book were discussed.

B. The refineries indicated a need for the new instructions as follows:

Corpus Christi	5
Toledo	10
Tulsa	5
Marcus Hook	25
Yabucoa	2
Duncan	10
	57 copies

VIII. Other Topics Discussed

A. Hair styles

B. Safety Manual - Part II

It was agreed that Connor would receive an outline of each proposed manual by February 1, 1974. He will reproduce and distribute these so each refinery can see what the others are doing.

C. Marking non-potable water

D. Ground Fault Detectors - Bob McCloskey showed a film and handed around literature and samples.

E. The definition of first-aid and medical was accepted as proposed, except for including butterfly closures under first-aid treatment as well as medical treatment.

IX. The group visited the Tulsa Refinery, where the new Squirt truck was demonstrated.

JMC/mb
1/9/74