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FROM: T. G. Grumbles
DATE: March 29, 1990

VISTA

Interoffice Communication

SUBJ: **PROPOSED OSHA VOLUNTARY SURVEY**

Attached is correspondence regarding a potential OSHA survey activity. The survey will cover multiple areas including:

1) types of chemicals on-site
2) medical surveillance programs
3) exposure monitoring
4) process safety management systems
5) hazard communication and training programs.

The survey results are to be used to evaluate compliance costs for specific "generic" standards OSHA is considering.

As you can see, this is a lengthy survey. However, I would recommend we respond if we get a survey. If they do use the data to calculate compliance costs, we would like for them to have a representative data base.

Tom

T. G. Grumbles

cao

Attachment

DISTRIBUTION: Safety Directors
Bruce Trego - Aberdeen
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VVV 000012785

cc: R. W. Seymour-Aberdeen, L. R. Bauer-Baltimore, G. D. Williams-Blane, Jim Pavao-Hammond, J. Friend-LCCP, J. W. Ware-LCLAB, R. A. Conrad-LCVCM, H. D. Garrison-OKC, P. L. Foote-Premiere, V. W. Weiss-Austin, J. A. DeBernardi, T. H. Huffman, Gary Draper

The Society of the Plastics Industry, Inc.

1275 K Street, N.W., Suite 400
Washington, D.C. 20005
(202) 371-5200
FAX 371-1022

TO: OHEIC Steering Committee

FROM: Phil Stapleton - Assistant Technical Director, Issues Analysis

RE: Upcoming OSHA Survey on Medical Surveillance and Exposure Assessment Programs

DATE: March 21, 1990

As noted in the Federal Register on February 23 (55 FR 6491), OSHA intends to conduct a large-scale survey of industrial programs for medical surveillance, exposure assessment, and integrated process safety management systems. If expedited OMB approval of this survey is granted, OSHA plans to initiate telephone surveys by mid-April.

As you may recall, OSHA announced in November 1989 that it planned to propose generic standards for medical surveillance. The voluntary survey is intended to collect the data needed to evaluate compliance costs associated with possible generic standards for medical surveillance, exposure assessment and integrated process safety systems.

A copy of the survey form is attached. As you can see, the survey requests information on the following topics:

- types of chemicals used on-site, their annual usage, number of employees exposed, and how many of these employees are covered by medical surveillance programs.
- medical surveillance programs - frequency and extent of examinations, how the program is implemented, how the information is used, etc.
- exposure monitoring - extent of coverage, types of substances/hazards covered, how the information is used etc.
- integrated process safety management systems - use of pre-startup safety reviews, written operating procedures, safety inspections, equipment testing and maintenance, and personal protective equipment.

In addition to these topics, the survey also requests information on hazard communication and training programs, and recent injury and illness records.

It would appear that OSHA is poised to significantly increase its use of generic standards to supplement more stringent exposure limits for hazardous substances and other safety requirements. We may want to collect information (independent of OSHA's survey) on the use of medical surveillance, exposure assessment and integrated process safety management systems within the plastics industry so that we can accurately estimate the potential costs of implementing such programs.

If you have any questions or comments please let me know.

PJS/rc
Attachment

cc: Pat Toner - SPI
Lew Freeman - SPI
Richard LaLumondier - SPI
Maureen Healey - SPI
John Dubeck - Keller & Heckman

OMB Approval No. xxxx
SIC Code xxxx
OSHA Contact: Kristine Leininger
(202) 523-7177

February 2, 1990

Name
Company
Address
City, State

Dear ---------:

The Occupational Safety and Health Administration (OSHA) is considering the development of generic standards to address medical surveillance and exposure monitoring programs. OSHA is also developing regulations on integrated safety management methods for process-related hazards, including fire and explosion risks, injuries due to ergonomic factors, and other contributors to workplace injuries and illnesses. OSHA believes such regulations could significantly improve workplace safety and health as well as enhance the effectiveness of existing regulations.

OSHA is conducting a voluntary telephone survey as part of this regulatory effort to determine the extent to which medical surveillance, exposure monitoring, and process safety management are currently done in industry. Your firm has been selected to participate in this survey, and an interviewer will be calling you within the next few weeks. A copy of the survey instrument is attached. Information and cooperation from your firm will help OSHA develop the most practical and effective standard possible. To insure confidentiality, the survey information will be stored in a data base that will not permit individual firms or their responses to be identified.

The survey covers the following areas: medical surveillance programs, types of processes and operations, chemicals used, exposure assessment procedures including monitoring programs, hazard communication, engineering review of process and equipment safety, maintenance practices, employee training, assessments of ergonomics and other hazards, and recent injury and illness experience. We would appreciate your forwarding this letter to the person or persons in your organization best suited to respond to the survey.

We are required by the Office of Management and Budget to inform you that the public reporting burden for this collection of information is estimated to average 60 minutes per respondent, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. If you have comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, please send them to both the Office of Information Management, Department of Labor, Room N1301, 200 Constitution Ave., N.W., Washington, DC 20210 and the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

We look forward to talking to your firm about these issues.

Sincerely,

Gerard F. Scannell

Assistant Secretary for OSHA

Medical Surveillance Survey, OSHA

[INTERVIEWER INSTRUCTIONS: RECORD THE FOLLOWING INFORMATION]

Interviewer Number
Cell Category
Size Code (1-4)
Sequence Number (max. 600)
Call Record SIC
Number of Employees
[Reenter Sequence #]
[Reenter SIC]

INTRODUCTION

Hello. My name is ________ and I'm calling from KCA Research in Alexandria, Virginia. We are conducting a survey on behalf of the Occupational Safety and Health Administration (OSHA) of the U.S. Department of Labor to assess the current practices in industry in the use of Medical Surveillance, Exposure Assessment, Process Safety Management and Ergonomic programs. A letter was sent to your facility informing you of this survey.

As the letter indicated, we are interested in understanding the extent of health and safety programs in industry. We would like to emphasize that all responses will be kept strictly confidential. Respondents will not be identified by name in any reports or data compilations submitted to OSHA.

We are interested in collecting information about your firm at <u>address.</u> Should I direct my questions to you, or is there someone else in the facility with whom you would prefer I speak?

1. Our records show your firm to be in SIC code XXXX, which is ________. Is this correct?

   a. yes
   b. no
   c. don't know   If "a", go to Q4.
   d. refused

2. How would you describe your line of business?

   a. ________ (record verbatim)
   b. don't know
   c. refused

3. Do you happen to know what that SIC code is?

   a. enter SIC ________
   b. don't know
   c. refused

VVV 000012790

4. Are you a publicly owned company?

   a. yes
   b. no
   c. don't know
   d. refused

   If "a", only continue if in an OSHA state-plan state. Otherwise, terminate.

5. In total, how many employees work at your establishment?

   a. ________ (record verbatim) **(If zero or refused, terminate)**

6. I'd like you to divide the employees at your establishment into four broad groups for me. The first group called administrative employees will be those who perform only administrative, managerial, clerical, sales, or similar functions. The second group called production employees would be those who have at least some responsibility for producing the goods or providing the service of your establishment. Included in this group will be custodial employees. The third group called laboratory employees would be those who work in laboratories, including those that perform quality control, R&D, or various testing activities for your company. The fourth group called maintenance employee would be those that perform non-custodial maintenance and repair activities. Do not include contract workers. How many employees are: (record all that apply)

   a. administrative employees — Record number ________
   b. production employees — Record number ________
   c. laboratory employees — Record number ________
   d. maintenance employees — Record number ________

7. Are contract workers used in this facility?

   a. yes
   b. no
   c. don't know
   d. refused

   If "b, c or d", go to Q9.

8. Which work is performed by contract workers? (record all that apply)

   a. production
   b. non-janitorial maintenance
   c. clean-up maintenance
   d. laboratory
   e. pickup/delivery
   f. other ________ (record verbatim)
   g. don't know
   h. refused

VVV 000012791

9. I'm going to read a list of chemicals that many firms engaged in your line of business often use. I'd like you to tell me which, if any, of these chemicals are used at your location, how many employees are exposed, how much of each one you use in a year, and whether you perform medical surveillance for the chemicals. The term "medical surveillance" refers to the practice of providing physical examinations and medical tests to employees for the purpose of detecting the presence of injuries or illnesses that might be related to work activities. Do you use _______? (SIC-specific prompt list of chemical will be provided. Administrative establishments in manufacturing SIC's will be prompted with a separate list.)

CHEMICAL	NUMBER OF EMPLOYEES EXPOSED	ANNUAL USAGE (lbs. or gals./year)	MEDICAL SURVEILLANCE
A	_______	_______	_______
B	_______	_______	_______
C	_______	_______	_______
D	_______	_______	_______

Limit chemical response to 4 chemicals. Respondent will be prompted with a list of chemicals which are ordered according to toxicity.

If no chemicals are used at this facility, go to Q15.

10. Are there any other chemicals used that I did not mention?

A	_______	_______	_______
B	_______	_______	_______
C	_______	_______	_______
D			

Limit chemical response to 4 chemicals.

11. Do you have more than 10,000 pounds (or 1,500 gallons) of any flammables stored in one location at your facility?

a. yes
b. no **If "b, c, or d", go to Q15.**
c. don't know
d. refused

12. Does this consist only of hydrocarbons that are used on-site for fuel?

a. yes
b. no **If "a", go to Q15.**
c. don't know
d. refused

13. Does this include only flammables stored or transferred on-site only (i.e. not processed or sold)?

    a. yes
    b. no
    c. don't know
    d. refused

14. Are the flammable materials stored below their boiling point without the use of chilling or refrigeration?

    a. yes
    b. no
    c. don't know
    d. refused

OVERALL PLANT QUESTIONS

-ADMINISTRATIVE

The following questions pertain to administrative actions for potential health and safety hazards.

We would like to ask you some questions regarding medical surveillance practices.

15. Please tell me whether your facility has any of the following exams available to employees.
    (record as many as apply)

    a. pre-employment examination
    b. routine periodic examination for employees exposed to hazardous chemicals
    c. routine periodic examinations for employees exposed to physical stresses (i.e. heat, repetitive motion)
    d. examinations for workers required to wear respirators
    e. routine examinations prior to termination of employment
    f. formal employee wellness program
    g. random drug testing
    h. other ________ (record verbatim)
    i. none
    j. don't know
    k. refused   If "i, j, or k", go to Q29.

16. Do you perform the following medical surveillance examinations? For which employees?

(1) pre-employment
(2) routine periodic

a. all employees
b. production employees only
c. only those employees covered by OSHA requirements for medical surveillance
d. other ______ (record verbatim)
e. don't know
f. refused

17. Please indicate which of the following tests are performed, the frequency of the tests performed and for whom. (record as many as apply)

	FREQUENCY	TYPE OF EMPLOYEE
a. general physical examination	______	________
b. written medical and work history		
c. audiometric examination	i. varies with age	
d. pulmonary function	ii. every 3-5 years	
e. complete blood count	iii. every 2 years	
f. serum chemistries	iv. every year	
g. urinalysis	v. other __ (record)	
h. chest x-ray	vi. don't know	
i. cholinesterase activity	vii. refused	
j. musculoskeletal examinations		
k. other _______ (record verbatim)		
l. none		
m. don't know		
n. refused		

18. Are any of the workers at this facility required to wear respirators?

a. yes
b. no
c. don't know — If "b, c, or d", go to Q20.
d. refused

19. Which of the following tests does your company give to workers who are required to wear respirators? (record all that apply)

a. general physical examinations
b. pulmonary function
c. chest x-ray
d. stress test
e. other __________ (record verbatim)
f. don't know
g. refused

20. Where is your company's medical surveillance program conducted?

a. on site
b. off site
c. both on and off site
d. don't know If "d, or e", go to Q22.
e. refused

21. Who implements your company's medical surveillance program?

a. certified occupational physician
b. other licensed physician
c. certified occupational nurse
d. other registered nurse
e. licensed practical nurse
f. other _______ (record verbatim)
g. don't know
h. refused

22. Does your company have a formal arrangement with any of the following outside sources to provide medical surveillance services?

a. occupational health clinic
b. other clinic, hospital, or HMO
c. private physician
d. mobile medical van service
e. insurance carrier
f. other ______ (record verbatim)
g. none
h. don't know
i. refused

23. How long are the medical records retained?

a. duration of employment
b. duration plus X number of years (record "X")
c. other _______ (record verbatim)
d. don't know
e. refused

24. Does your company systematically review the medical records each year?

a. yes
b. no
c. don't know If "b, c, or d", go to Q26.
d. refused

25. Are employee exposure assessments and monitoring data available to the individual conducting this review?

a. yes
b. no
c. don't know
d. refused

26. Do you use the medical surveillance results to implement or to change the following programs? (record all that apply)

a. exposure monitoring
b. training
c. engineering controls
d. personal protective equipment
e. workstation analysis for ergonomic hazards
f. other ________ (record verbatim)
g. don't know
h. refused

27. Are employees notified of the results of their medical examination?

a. yes
b. no
c. don't know
d. refused

28. On average, how many hours is an employee away from work to take a medical examination?

a. 1 hour
b. 2 hours
c. 3 hours
d. other _________ (record verbatim)
e. don't know
f. refused

I would now like to ask you some questions concerning monitoring for potentially hazardous substances.

29. Do you have an exposure monitoring program?

a. yes
b. no
c. don't know   If "b, c or d", go to Q41.
d. refused

30. For which employee do you perform exposure monitoring? (record all that apply)

a. administrative
b. production
c. laboratory
d. maintenance
e. other ______ (record verbatim)
f. don't know
g. refused

31. Which of the following types of potential hazards are covered under your exposure monitoring program? What percentage of your exposure monitoring is related to that hazard? (record all that apply)

a. substance specific OSHA regulated substances, which include asbestos, benzene, formaldehyde, ethylene oxide, cotton dust, coke oven emissions, and lead.
b. z-table chemicals
c. other substances
d. biological agents
e. noise
f. radiation
g. other _____ (record verbatim)
h. don't know
i. refused

32. Who performs the exposure monitoring?

a. company staff
b. outside consultants
c. insurance carriers
d. other _____ (record verbatim)
e. don't know
f. refused

33. Does your facility perform any of the following monitoring techniques for substances that are easily absorbed through the skin?

(1) surface wipe sampling
(2) skin (gauze) patch sampling
(3) biological monitoring (taking blood or urine samples to determine absorption)
(4) other _______ (record verbatim)

a. yes
b. no
c. don't know
d. refused

If "a" for #2, continue. Otherwise go to Q35.

34. How many dermal (patch) samples were collected at this facility during the past year? For how many exposed workers? (record all that apply)

a. number of samples ________
b. number of exposed workers ________
c. don't know
d. refused

35. For all types of monitoring do you use the results to implement or to change the following programs? (record all that apply)

a. additional monitoring
b. training
c. engineering controls
d. personal protective equipment
e. medical surveillance
f. other ________ (record verbatim)
g. none
h. don't know
i. refused

36. Do you compute any of the following statistics from your monitoring data? (record all that apply)

a. average
b. arithmetic standard deviation
c. geometric mean
d. geometric standard deviation
e. maximum exposure observed
f. other ______ (record verbatim)
g. none
h. don't know
i. refused

37. What percent of all monitoring samples result in overexposure?

a. ________ percent
b. don't know If answer "a" is = 0 or b or c, go to Q39.
c. refused

38. How do you define overexposure? (record all that apply)

a. > PEL
b. < PEL but > 1/2 PEL
c. > TLV
d. > ceiling/excursion
e. > STEL
f. other ________ (record verbatim)
g. don't know
h. refused

VVV 000012798

39. Does your company notify workers of their monitoring results?

a. yes
b. no
c. don't know
d. refused

40. Are monitoring results communicated to contract employees?

a. yes
b. no
c. don't know
d. refused

The following questions pertain to a company's procedure for assessing potential exposure to health, safety and stressor hazards. We will refer to this as an exposure assessment.

41. Do you perform any of the following exposure assessment elements?
(record as many as apply)

a. workplace inventory of chemical agents
b. workplace inventory of physical and biological agents and ergonomic stressors
c. grouping of jobs by hazard for control or evaluation
d. qualitative ranking of exposure risks.
e. documentation of qualitative exposure assessment results
f. development of quantitative exposure monitoring strategy or protocol
g. exposure monitoring/sampling
h. evaluation of monitoring results
i. records of exposure assessment program
j. reevaluation of exposure assessment based on new regulation, employee complaint or health effects data
k. reevaluation of exposure assessment after changes in chemical used or changes in process
l. reevaluation of exposure assessment based on seasonal changes
m. other ___________ (record verbatim)
n. none
o. don't know
p. refused

If "n, o, or p", go to Q47.

42. For which employees do you perform an exposure assessment? (record all that apply)

a. administrative
b. production
c. laboratory
d. maintenance
e. other _____ (record verbatim)
f. none
g. don't know
h. refused

43. What percentage of your facility's workers are included in your exposure assessment program? (record all that apply)

a. administration __________
b. production __________
c. laboratory __________
d. maintenance __________

44. Who performs this exposure assessment?

a. company staff
b. outside consultants
c. insurance carriers
d. other _____ (record verbatim)
e. don't know
f. refused

45. Do you maintain records of the results of the exposure assessments that are performed at your facility?

a. yes
b. no
c. don't know
d. refused

46. Which of the following activities are initiated as a result of your exposure assessment program? (record all that apply)

a. employee exposure monitoring
b. medical surveillance
c. use of personal protective equipment
d. implementation of process change or engineering controls
e. development of internal exposure guidelines
f. toxicology testing
g. other ______ (record verbatim)
h. don't know
i. refused

47. As a result of conducting a medical surveillance program or an exposure assessment program, including use of monitoring if applicable, has your company noticed any of the following changes? What is the estimated percent change? (record all that apply)

a. reduction in illness by _____
b. reduction in injuries by ______
c. reduction in insurance costs by _____
d. reduction in legal expenses by ______
e. increased productivity by ______
h. other ________ (record verbatim)
i. don't know
j. refused

48. Do you have a hazard communication program in place for the following employees? (record all that apply)

a. administrative
b. production
c. laboratory
d. maintenance
e. other _____ (record verbatim)
f. none If "f, g, or h", go to Q50.
g. don't know
h. refused

49. Which of the following is included as part of your hazard communication program? (record all that apply)

a. overview of the standard
b. hazards of routine and non-routine jobs
c. use and location of MSDS
d. explanation of labels
e. health hazard evaluation of the chemicals produced or used
f. protective equipment requirements
g. other _______ (record verbatim)
h. don't know
i. refused

50. Do you have a formal emergency response plan in place?

a. yes
b. no
c. don't know
d. refused

51. Does your facility have a written safety program?

a. yes
b. no
c. don't know If "b, c or d" go to Q59.
d. refused

52. Which of the following is included in the safety program? (record all that apply)

a. material hazards information
b. lockout/tagout procedures
c. hot work procedures
d. personal protective equipment use
e. remedial action for exposures
f. confined space entry procedures
g. special procedures for opening process equipment and piping
h. other _______ (record verbatim)
i. don't know
j. refused

53. How are safety rules communicated to employees? (record all that apply)

a. written
b. oral
c. classroom training
d. on-the-job training
e. informally
f. other ______(record verbatim)
g. not communicated
h. don't know
i. refused

54. Who enforces the safety rules? (record all that apply)

a. supervisor
b. safety director
c. safety committee
d. labor agreement
e. other ______ (record verbatim)
f. no one
g. don't know
h. refused

55. Is there a safety committee?

a. yes
b. no If "b, c, or d" go to Q58.
c. don't know
d. refused

VVV 000012802

56. Does the safety committee have representatives from: (check all that apply)

a. labor
b. management
c. other ______ (record verbatim)
d. don't know
e. refused

57. Has your company noticed any of the following changes as a result of implementing a written safety program? What is the estimated percent change? (record all that apply)

a. reduction in illness by _____
b. reduction in injuries by ______
c. reduction in insurance costs by _____
d. reduction in legal expenses by ______
e. increased productivity by ______
h. other ________ (record verbatim)
i. don't know
j. refused

58. Do you issue hot work permits at your facility?

a. yes
b. no If "b, c or d" go to Q60.
c. don't know
d. refused

59. How many permits do you issue annually?

a. ______ per month
b. don't know
c. refused

-ENGINEERING RELATED

We would now like to ask you questions concerning engineering-related procedures to correct or control safety and health hazards.

60. For the following types of process situations, do you perform a pre-startup safety review?
(record all that apply)

a. for new processes?
b. for modified processes where only procedures or methods of operation have changed
c. for modified processes where process equipment has been changed.
d. other _______ (record verbatim)
e. none
f. don't know
g. refused

If "e, f, or g", go to Q65.

61. Does the pre-startup safety review check that:
(record all that apply)

a. construction meets the specifications
b. safety, operating and maintenance procedures are adequate and in place
c. the prerequisites for startup are completed
d. training of operator is complete
e. other _______ (record verbatim)
f. don't know
g. refused

62. Does your facility have written procedures to address changes made with respect to:
(record all that apply)

a. the chemicals used in a process
b. the technical information about a process
c. the design of an existing piece of equipment or system
d. other ______ (record verbatim)
e. none
f. don't know
g. refused

If "e, f, or g", go to Q65.

VVV 000012804

63. Which of the following does the written procedure address? (record all that apply)

a. the technical basis for the change
b. the impact on safety and health
c. modifications to operating procedures
d. requirements for authorizing the change to be made
e. other ______ (record verbatim)
f. don't know
g. refused

64. How do you inform workers of procedural changes either to the process they perform or the equipment they operate?

a. written
b. oral
c. classroom training
d. on-the-job training
e. other _____ (record verbatim)
f. none
g. don't know
h. refused

65. How oftem are facility safety inspections conducted?

a. daily
b. weekly
c. monthly
d. other ______ (record verbatim)
e. never
f. don't know
g. refused

-WORK PRACTICE RELATED

66. Do you have any personnel whose sole or primary duty is to inspect and test equipment?

a. yes
b. no
c. don't know
d. refused

67. Do you use maintenance workers to do the following? (record all that apply)

a. routine maintenance
b. repair of breakdowns
c. inspection and testing
d. maintenance support
e. specific projects
f. turnaround (cleanup, etc.)
g. other ______ (record verbatim)
h. don't know
i. refused

68. Are operators expected to perform routine maintenance on their equipment?

a. yes
b. no
c. don't know
d. refused

-PPE

69. Are workers required to use personal protective equipment at your facility?

a. yes
b. no
c. don't know
d. refused

If "b, c, or d", go to Q72.

70. Is there a written policy addressing the selection, use and limitations, decontamination, maintenance, and storage of the personal protective equipment?

a. yes
b. no
c. don't know
d. refused

71. Have all employees who are required to wear personal protective equipment been trained upon initial assignment, biennially, and after a major job or process change?

a. yes
b. no
c. don't know
d. refused

-TRAINING

72. Is it company policy to train workers in the operating procedures of the process they work with or perform?

a. yes
b. no — If "b, c, or d" go to Q80.
c. don't know
d. refused

73. What types of workers receive this training? (check all that apply)

a. all employees
b. all production employees (including supervisors)
c. new employees
d. production workers assigned to a process unit or work activity where they have not previously worked.
e. contract employees
f. maintenance employees
g. other _______ (record verbatim)
h. don't know
i. refused

74. Does training for non-contract employees address the following topics? (record all that apply)

a. potential hazards of the process
b. procedures and safe practices applicable to the process
c. emergency response
d. proper use of personal protective equipment
e. general safety rules of the facility
f. changes to the process they work with
g. other ________ (record verbatim)
h. don't know
i. refused

75. Do contract employees receive a briefing (or short training session) which addresses the following topics? (only ask if **answered "e" in Q73.)** (record all that apply)

a. potential hazards of the process
b. procedures and safe practices applicable to the process
c. emergency response
d. general safety rules of the facility
e. other _______ (record verbatim)
f. don't know
g. refused

76. How often are training sessions scheduled?

a. monthly
b. as needed — If "a" go to Q78.
c. new hires
d. other _____ (record verbatim)
e. don't know
f. refused

77. How many training sessions are given each year?

a. number of sessions _______
b. don't know
c. refused

78. Typically, how many people attend a training session?

a. number of workers ______
b. number of trainers ______
c. don't know
d. refused

79. How long does each training session last?

a. _______ hours (or fraction thereof)
b. don't know
c. refused

PROCESS ORIENTED

80. OSHA has constructed a breakdown of processes that might be analyzed separately during a hazard analysis. I'm going to read a list of processes that many firms engaged in your type of business often have. I'd like you to tell me which, if any, of these processes are present at your facility. Also, if your company groups these processes for hazard analysis purposes, please give me your list. Do you have a _______? **(SIC-specific prompt list of processes will be provided).**

(1) process a
(2) process b
(3) process c (etc.)

81. Are there any other processes present that I did not mention?

(1) process a
(2) process b
(3) process c (etc.)

Now I am going to ask questions about elements related to the processes you mentioned. (Certain processes will prompt certain questions or parts of a question.)

82. Do you have a set procedure for compiling technical information on individual processes?

    a. yes
    b. no   If "b, c, or d", go to Q90.
    c. don't know
    d. refused

83. Have you compiled any of the following types of information for individu~l processes?
    (record all that apply)

    a. process flow diagram
    b. process chemistry
    c. maximum intended inventory of hazardous chemicals
    d. safe upper and lower limits for operating procedures
    e. safety and health results of operating outside these limits
    f. equipment design information
    g. written operating procedures
    h. other _________ (record verbatim)
    i. none
    j. don't know
    k. refused

84. Which of the following are addressed in your operating procedures for individual processes?

    a. temporary operations
    b. emergency operations including emergency shutdown
    c. start-up following downtime
    d. safety equipment available for use with this process
    e. the function of that safety equipment
    f. measures to be taken if physical contact or airborne exposure occurs
    g. other special or unique hazards associated with this process
    h. other _______ (record verbatim)
    i. don't know
    j. refused

85. Does someone review the operating procedures for agreement with the following?

(1) hazardous chemical information for this process
(2) technical design information for this process
(3) equipment design information for this process

a. yes
b. no
c. don't know
d. refused

86. Have the employees working with a process unit received training in operating procedures specific to the process unit?

a. yes
b. no
c. don't know
d. refused

87. How much time is spent in initially training each employee in operating procedures?

a. _________ (record verbatim)
b. don't know
c. refused

88. Are formal inspections and tests of critical equipment in each process conducted periodically?

a. yes
b. no
c. don't know If "b, c or d", go to Q90.
d. refused

89. How many days of work (man-days) are spent on inspecting and testing critical equipment each month?

a. ________ (record verbatim)
b. don't know
c. refused

90. When changes are made in the technology of an operation, is the compiled information updated to reflect the change?

a. yes
b. no If "b, c or d", go to Q92.
c. don't know
d. refused

91. Are employees informed of such changes?

a. yes
b. no
c. don't know
d. refused

PROCESS LOOP

Now, I would like to ask you questions for each of the processe
you mentioned earlier.

92. How many workers at this location participate in "process a"

a. __________ workers (record verbatim)
b. don't know
c. refused

93. How many processes of this type do you have?

a. __________ (record verbatim)
b. don't know
c. refused

94. Does this process have any of the following engineerir controls?
(record all that apply)

a. general ventilation
b. local exhaust ventilation
c. laboratory exhaust ventilation
d. noise reduction control
e. enclosure
f. other ______ (record verbatim)
g. none
h. don't know
i. refused

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95. Have you performed any of the following hazard analyses c this process? If yes, for which employees?
(record all that apply)

(1)	ergonomic analysis	a.	administrative
(2)	exposure analysis	b.	production
(3)	fire, explosion prevention	c.	laboratory
(4)	spills prevention	d.	maintenance
(5)	other _______ (record verbatim)		
(6)	none		
(7)	don't know		
(8)	refused		

If did not answer "(1)", go to Q

If answered "(6), (7), or (8)", go to

96. Which of the following elements is included in your ergonomi
analysis?
(record all that apply)

a. analyzing injury and illness records for evidence o cumulative trauma disorders
b. cataloging work content
c. analyzing work content with respect to potentia biomechanical risk factors for cumulative traum disorders
d. measuring and documenting time required to perform eac work task
e. analyzing production records
f. video taping jobs
g. developing check-lists to identify undesirable worksit conditions or worker activities that contribute t cumulative trauma disorders
h. developing study of the work environment
i. other _________ (record verbatim)
j. don't know
k. refused

97. What actions have you taken resulting from the informatio generated by the ergonomic analysis?

a. redesign work methods
b. redesign workstation
c. substitution of tools
d. other _________ (record verbatim)
e. don't know
f. refused

98. Have you noticed any reduction in absenteeism, turnover o insurance claims as a result of these ergonomic changes?

a. yes
b. no
c. don't know
d. refused

99. Who performs the hazard analysis (ergonomics, exposure, fir or explosion, or spills)?

a. in-house staff
b. outside consultants
c. combination of both
d. other _______ (record verbatim)
e. don't know
f. refused

100. Are written reports prepared for each hazard analysis that is performed?

a. yes
b. no
c. don't know
d. refused

101. Which of the following does this analysis include? (record all that apply)

a. a description of the results
b. a list of recommendations
c. the actions taken as a result of the hazard analysis
d. other _______ (record verbatim)
e. don't know
f. refused

102. How many days of work (man-days) are required to perform the hazard analysis, including providing a written report?

a. _________ (record verbatim)
b. don't know
c. refused

103. Are hazard analyses performed on process units before they are started or restarted?

a. yes
b. no
c. don't know
d. refused

104. What type and number of air samples were collected during the calendar year for how many exposed workers?

	# of samples	# of exposed workers
Personal		
a. full shift		
b. short-term		
c. peak		
General area		
d. full shift		
e. short-term		
f. peak		

END OF LOOP

105. Did your establishment have any lost time occupational injuries or illnesses recordable on OSHA Form 200 during 1988 and 1989?

a. yes
b. no
c. don't know
d. refused

If "a", request copies of the OSHA 200 log and any supplemental forms they may have. Give address.

Vista Chemical Company
900 Threadneedle
Houston, Texas 77079
(713) 588-3000
P.O. Box 19029
Houston, Texas 77224
Fax (713) 588-3236

TGG: JCL: ERT: MJH: AJO: RF

XF: ______________ VISTA

March 30, 1990

Mr. John Korchynski
Purchasing Manager - Chemicals
Lever Brothers Limited
1 Sunlight Park Road
Toronto, Ontario M4M 1B6

Dear John:

Attached is Vista's response to the supplier environmental survey. Please call me at 713-588-3445 if you have questions regarding the answers.

Sincerely,

Thomas G. Grumbles

Thomas G. Grumbles, C. I. H.
Environmental Quality Manager

dlj

cc: R. Rose, M. Fortier, R. Swantkowski, B. E. A. Larsen, W. J. B. Vogel, J. R. Ball

Attachment

VISTA CHEMICAL RESPONSE
LEVER BROTHERS LIMITED ENVIRONMENTAL SURVEY

1. **Does your company have an environmental policy?**

   Yes. (see attached)

2. **Is there a person in charge of environmental affairs in your company?**

   Yes. Thomas G. Grumbles, Environmental Quality Manager
   Reports to R. D. Gamblin, Senior Vice President, Operations

3. **Is your company in compliance with the Municipal or local, Provincial or State and Federal laws regarding the environment?**

   Yes. Vista is in substantial compliance with all applicable environmental regulations. We do have some minor enforcement actions pending at this time.

4.(a) **Has your company ever been prosecuted for environmental reasons?**

   No

4.(b) **Is there any pending legal action against your company regarding environmental issues?**

   Yes. We currently have some minor enforcement actions pending against the company. The company is in the process of responding to these actions and is cooperating appropriately with government bodies to resolve them in a mutually satisfactory manner.

5. **Has your company completed an environmental audit?**

   Yes. An independent environmental audit was done on all company operations in June of 1989. This was done for lending banks as part of a company financial restructuring.

   The corporate environmental group also does environmental audits on a routine basis for company operations. Audit results are reported to plant and senior management.

6. **Has your company completed environmental audits on your suppliers?**

   No. We currently audit ex-plant operations (terminals, toll processors, etc.) and have common carrier qualification programs. However, we do not audit our suppliers.

If no, is one planned?

No.

7. **Has your company invested in environmental programs or equipment?**

Yes. Additional details on this question will be provided in the near future.

8. **Is your company involved in a recycling program?**

Yes. We have established waste minimization programs in manufacturing that may include recycling activities at the manufacturing sites. We are currently developing an aluminum can and paper recycling program at corporate headquarters in Houston. The R&D facility has a recycling program for aluminum cans, and is expanding it to include paper goods.

9. **Is your company involved in other environmental activities? (such as education, car pooling, etc.)**

Yes. Vista is a participant in CMA's Responsible CARE program. Details on this program are attached. This program is modeled after the Canadian Chemical Manufacturer's Association's program. Activities include education and environmental awareness training for all company employees, for communities surrounding our operations and governmental officials.

Vista is involved in CMA, as well as state chemical associations such as the Louisiana Chemical Association and the Maryland Chemical Industry Council. Our Baltimore plant manager was just elected Vice President of the Maryland CIC. These activities involve chemical industry advocacy and education efforts for the general public.

Vista has established a biological technology group in R&D that is, among other activities, exploring waste treatment technologies and process technologies that will produce less waste in the production of chemicals. Both of these activities will ultimately result in more environmentally friendly processes and products.

Also, we have attached copies of articles from Vista's internal company newspaper, ChemNews. These articles describe the activities mentioned above as well as other environmental projects and teams that are ongoing at Vista.

One other note, we are currently holding monthly environmental seminars for senior management in Houston. These seminars are covering a broad range of regulatory and environmental program matters from hazardous waste rules to the regulations impacting new product development. The seminars are attended by all senior and executive management in Houston, clearly indicating their involvement in the decision making regarding these matters.

Vista Chemical Company

ENVIRONMENTAL POLICY

Vista Chemical Company produces and transports chemical products that can potentially impact the environment in the communities in which we conduct business. Vista believes that compliance with all laws and regulations related to environmental quality and public health protection is a *minimum* standard of acceptable practice. Vista Chemical Company is committed to improving Vista's environmental protection efforts to achieve performance levels exceeding those required by law.

Vista recognizes the responsibility we have to our employees, the surrounding communities, customers, carriers, contractors and government agencies to conduct our business activities according to the following environmental principles:

- Vista will inform and educate employees, surrounding communities, customers, carriers, contractors and government agencies of the health and environmental hazards of the chemicals we make, use and sell. These activities will involve recognizing and responding to community concerns regarding environmental issues.

- Vista will continually reduce the risk to employees and neighboring communities posed by chemical substances used, produced and transported within our communities.

- Vista will continue to take steps to reduce emergencies involving chemical releases that would impact the environment and surrounding communities.

- Vista will foster and maintain an awareness of and sensitivity to environmental responsibility among our employees through an ongoing internal communication program.

- Vista will maintain an environmental quality assurance program to ensure that operations are in full compliance with Company policies and procedures, governmental permit limitations and regulatory requirements.

- Vista will determine how each new or existing product can be made, used, handled and disposed of while protecting employee safety, public health and the environment.

- Vista will make safety, health, environmental control and waste minimization essential and integral parts of process and facility design, construction and operation.

- Vista will reduce waste generation in the air, water and soil through employee involvement and the pursuit of source-control technology.

- Vista will work with the government and other parties in developing responsible laws, regulations and standards to protect employees, surrounding communities and the environment.

Guiding Principles for

RESPONSIBLE CARE

A Public Commitment

As a member of the Chemical Manufacturers Association, this company is committed to support a continuing effort to improve the industry's responsible management of chemicals. We pledge to manage our business according to these principles:

- **To recognize and respond to community concerns about chemicals and our operations.**
- **To develop and produce chemicals that can be manufactured, transported, used and disposed of safely.**
- **To make health, safety and environmental considerations a priority in our planning for all existing and new products and processes.**
- **To report promptly to officials, employees, customers and the public, information on chemical-related health or environmental hazards and to recommend protective measures.**
- **To counsel customers on the safe use, transportation and disposal of chemical products.**
- **To operate our plants and facilities in a manner that protects the environment and the health and safety of our employees and the public.**
- **To extend knowledge by conducting or supporting research on the health, safety and environmental effects of our products, processes and waste materials.**
- **To work with others to resolve problems created by past handling and disposal of hazardous substances.**
- **To participate with government and others in creating responsible laws, regulations and standards to safeguard the community, workplace and environment.**
- **To promote the principles and practices of Responsible Care by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.**

CMA
CHEMICAL MANUFACTURERS ASSOCIATION

RESPONSIBLE CARE

A Public Commitment

SUMMARY DESCRIPTION

Responsible Care Program Elements

The ***Guiding Principles for Responsible Care of Chemicals*** is a statement of commitment by each member company to fully support a continuous effort to improve the industry's responsible management of chemicals. Each member company will pledge to operate according to the principles statement and will sign to that effect. This signed statement will be considered an obligation of membership in CMA. These guiding principles are based on CMA's 1983 policy statement on health, safety and the environment and on the Canadian Responsible Care principles. They also incorporate guidance received from member company executive contacts.

Following association adoption of the guiding principles, various CMA committees will begin development of ***Codes of Management Practices***. Each set of management practices will focus on a different concern.Impetus for developing an individual Code of Management Practices will come from either an industry belief that there exists a substantive need to take voluntary action or a substantial public concern to which the industry should be responsive, or both. Initially, code packages will be considered for CAER, transportation, release reduction and management, and plant operations. Based upon the implicit obligations of the guiding principles, the Codes of Management Practices will be designed by identifying expected management practices as objectives rather than prescribing any absolute or quantitative standard. Since the codes are intended to serve as objectives, they will complement any existing member company programs or practices that achieve the same goals. Responsible Care will therefore become an integral part of the existing company program, not a replacement or another duplicative overlay. Each Code of Management Practices will be approved by the board after the opportunity for comment by all member companies.

Another important element in the Responsible Care initiative is a ***Public Advisory Panel,*** which will be composed of a cross-section of environmental, health and safety thought leaders. The panel will be an industry (CMA) effort, not a company responsibility. It will be assembled and moderated by an experienced facilitator working at the association's direction and will serve to assist the industry in identifying and developing programs and actions that are responsive to public concerns and viewed as proactive by key policy groups. Meeting several times a year, the panel will review issues on which CMA requires comment and advice as well as to discuss subjects that panel members believe require industry response. The panel will critique (but not approve) all proposed Codes of Management Practices and is expected to provide early definition of public concerns involving the chemical industry. *Community Advisory Panels* at the local or regional level can serve companies and the industry in a similar manner. They will be called for as a milepost of a "CAER Code of Management Practices" and CMA will offer support to facilitate companies' formation and operation of these local panels.

Effective performance evaluation is a critical element of Responsible Care. ***Member Company Self-Evaluations of Management Practices,*** as well as compilation of quantitative results, will be necessary to meet three vital objectives. In order to build a collective record of tangible improvement in the responsible management of chemicals, specific management practice codes may call for CMA to collect and maintain *statistical trends* from data that members currently make available to governmental organizations. Details of quantitative trend statistics programs will be defined by task forces developing the respective management practice code package.

SUMMARY DESCRIPTION
(Continued)

Two additional objectives are served by Member Company Self-Evaluations of Management Practices. The first is to provide feedback from the membership on the value and relevance of codes of management practices and on any additional CMA support activities that may be needed. Second, such evaluations, along with quantitative trend data, will build CMA credibility and confidence on behalf of its members in dealing with government, the public and other external groups.

Each management practice code will contain definition of management practice "progress mileposts" that member companies will use to measure and evaluate their performance versus the commitment. Details of the member management practice evaluation program will be developed by a designated work group for the board of directors' consideration and approval. The work group will be requested to define the mechanics of a practical system based on member company self-evaluation of their progress. Evaluations will be coordinated through the member companies' executive contacts and will be designed to maximize the value to companies' efforts to improve their performance.

Due to their varying size and circumstances, member companies will not be expected to be at the same level of performance for each Code of Management Practices at the same time. However, it will be expected that each member company will be able to report continued progress.

To facilitate and support each member company's continual improvement in responsible management of chemicals, ***Executive Leadership Groups*** will be formed to provide an opportunity for executive contacts to periodically discuss progress and share experiences with each other that have been successful. These regional groups of ten to twenty executive contacts will meet several times a year to review Codes of Management Practices under development, discuss members' progress on existing codes, identify areas where individual companies need assistance from CMA or other companies, and to address other priority industry issues. Understandings developed during these meetings will be reviewed and acted on by the association's officers, executive committee and board of directors.

Endorsement of the Responsible Care initiative will be an ***Obligation of Membership*** in the association. Each member company's executive contact is expected to make a commitment to Responsible Care by:

a) signing the Guiding Principles for Responsible Care of Chemicals statement;

b) communicating the commitment to Responsible Care to employees; and

c) instructing management to make good-faith efforts to implement the Codes of Management Practices, participate in the self-evaluation process, and meet the expectations of the Responsible Care Program.

A member company's obligation to Responsible Care applies to those segments of the company's operations included in the CMA dues base (CMA Definition of Chemical Sales).

Member companies are also expected to participate in the development of the codes and programs. The Codes of Management Practices are intended to include mileposts that provide a road map for responding to industry priorities and the public's concerns. Member companies are expected to make good-faith efforts to move up the milepost ladder and meet the expectations of the Responsible Care initiative.

In an extreme case, where a member company has consistently not conducted its operations in accordance with the guiding principles and program elements of Responsible Care, association representatives will meet with the member company's executive contact to seek the company's positive involvement in the program. If this fails to produce a commitment to pursue the objectives of Responsible Care, the executive committee and board could take appropriate actions including the disassociation of the company from membership after due process requirements have been met.