

TO	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
See Below		
FROM	FIELD POINT OR DEPT. & BLDG. NO.	DATE THIS LETTER
R. D. Savage		8/10/77
SUBJECT		

To: C. L. Blackfan
N. G. Duke
J. F. Malone
R. L. Steller

Subject: Testing for Chemical Emissions in Customer Plants

Attached is a letter from Bill Becker on this subject. It attempts to present some uniform procedures we might use in conducting tests at customer locations.

We had some experience in 1974 related to VCM exposures and more recently with benzene and perhaps acrylonitrile.

I invite your comments on Bill's communication by August 22 and trust that we can agree on implementation shortly thereafter.



R. D. Savage

RDS:cg

cc: W. C. Becker w/o attachment
R. K. Hinderer w/o attachment
W. C. Holbrook w/o attachment
E. B. Osborne w/ attachment
M. E. Schmiederer w/o attachment
P. J. Weaver w/ attachment
B. M. G. Zwicker w/o attachment

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Cleveland

W. C. Becker

Cleveland - 5400

Aug. 8, 1977

TESTING FOR EMISSIONS IN CUSTOMER PLANTS

I understand that we have been involved in several instances of testing for various emissions in customer plants. I understand that this has been done to be able to make some judgment concerning the effect of the use of our products in further processing.

While these activities may be helpful to us as well as to our customers, I believe that it is imperative that we develop a system for decision concerning these testing programs and a format for reporting the results to the customers involved.

I should point out that I have no reason to believe that all of the suggestions which will follow are not already being done. This is by way of re-examining this question and assuring that these services are rendered in a way which will take into account all of the interests of the company and its customers.

1. We should assure ourselves that there is a proper company reason for doing the testing. Such reasons might include additional information for the company in the use of its products or special requests for assistance from customers.
2. We should assure ourselves that the testing is done in a thoroughly professional manner. The best test for this is that the testing should be done with the same care and attention used in our own plants for similar effort.
3. We should be sure that we are using accurate instruments and the most appropriate test protocol. We should be particularly careful about selection of persons or areas to be tested.
4. We should develop a format for reporting the tests, the results of the tests and the limitations of the tests to the customer involved. I believe such a format should include at least:
 - (a) The attachment to the test report of the test protocol including a description of the equipment used and the places tested.
 - (b) A complete report of the data derived from the tests including specific reference to the number of tests, the length of the tests, and the individual test results.

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- (c) A statement outlining the test conditions with respect to the plant itself. For example, were the tests conducted over a two day period in June, a five day period in December or whatever.
 - (d) A clear statement to the effect that the tests run are believed to be representative of conditions found under the particular and peculiar operating conditions existing at the time of the tests and the place where the tests were made and that no representation is made concerning other times, conditions or production levels.
 - (e) A clear statement that the responsibility for on-going worker safety is the responsibility of the operator of the plant.
5. We should consider whether a compilation of such data should be made available to all customers.



W. C. Becker

WCB/pac

Distribution: B. M. G. Zwicker
W. C. Holbrook
R. D. Savage
✓ M. Schneiderer
R. K. Hinderer



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