



DOW CHEMICAL U.S.A.

Building OC-101, Phone 5034

TEXAS OPERATIONS
FREEPORT, TEXAS 77541

September 18, 1990

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**UNIT I EDC/VCM RESPONSE: OCCUPATIONAL HEALTH AUDIT
RECOMMENDATIONS**

The following is the response requested on the audit items noted:

1. Fit testing and training for the 3M 8710 dust respirator has been scheduled through Industrial Hygiene Services and will be completed by December 1990.
2. September's Safety and Communications meetings will include chemical protective clothing training for Unit I employees. At present, the training is 50% complete.
3. The benzene standard will be implemented in its entirety (i.e., monitoring and training) during the months of September through October 1990.
4. Unit I Safety/VCM orientation checklist will be forwarded to Industrial Hygiene Services along with other pertinent documents for storage.
5. A program to track new chemical health hazard training is now in place. The records, if any, will be forwarded to Industrial Hygiene at the end of each calendar year.
6. Completed as of September 6, 1990.
7. EDC resampling in Direct Chlorination to delineate exposure during process sampling and analysis will be completed by November 1990.
8. Completed as of September 1, 1990.
9. Building air intakes have been reviewed and determined adequate for Unit I purposes at this time.

OCCUPATIONAL HEALTH CONSOLIDATED AUDIT REPORT

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UNIT I, OC-101
INDUSTRIAL CHEMICALS DIVISION

RECOMMENDATIONS (Not Prioritized)

1. Complete the fit testing and training for the 3M 8710 dust respirator.(1988 recommendation)
2. Conduct chemical protective clothing training.(1988 recommendation)
3. Implement the OSHA benzene standard. There are three initial requirements; 1) conduct initial monitoring to establish baseline benzene levels, 2) conduct initial training of the existing Dow employees and nestor contractors, and 3) include benzene training as part of the Unit I orientation program.

Additional requirements may be necessary depending on the monitoring data.

4. Begin sending the completed Unit I orientation checklist to Industrial Hygiene Services.
5. Conduct and document training whenever new chemicals are brought into the Unit I facility.
6. Update lab labels to be consistent with the Dow internal sample label guide.
- *7. Repeat the EDC industrial hygiene sampling in the Direct Chlorination area. Delineate between sample catching and sample analysis.
- *8. Conduct further evaluation of vinyl chloride exposures in the loading area. Include the laboratory as part of the analysis area.
9. Review the location of OC-101 air intakes.
10. Conduct an ergonomic evaluation during the caustic pot recharging task (W-261).
11. Attach the breathing air certificates of analysis directly to the cylinder.
12. Ensure that the annual respirator training is documented and forwarded to Industrial Hygiene Services.
13. Continue efforts to eliminate the asbestos storage areas and replace Survivair SCBAs with Scott SCBAs.
14. Update the Occupational Health Protocol.

*IMMEDIATE ACTION ITEM

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10. Approximately once per year the W-261 caustic pot is recharged. However, Industrial Hygiene Services will be contacted for an ergonomic evaluation of job task whenever it occurs.
11. Presently been done and will continue indefinitely.
12. Annual respirator training is scheduled for December and the records will be forwarded to Industrial Hygiene Services at year end.
13. Unit I has an aggressive program to phase out the use of asbestos containing materials. When this project is complete, asbestos storage areas will be eliminated altogether.

The survivair SCBA's will be replaced completely with the Scott SCBA's by 1991 year end. Replacement rate is affected by Dow's global prudent spending program.

14. Melissa Blue is in the process of updating the Unit occupational health protocol. Publication date is targeted for October 31, 1990.

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