

CC: R.A. Keefe

made & sent 11/9/77

TO H. Waltemate	FIELD POINT OR AKRON DEPARTMENT & BLDG. NO. Cleveland	DATE YOUR LETTER
FROM Dennis P. O'Keefe	FIELD POINT OR AKRON DEPARTMENT & BLDG. NO. Pedricktown	DATE THIS LETTER 8/15/77
SUBJECT		

OSHA INSPECTION OF PEDRICKTOWN PLANT - INTERIM REPORT

On 7/14/77 OSHA initiated a general inspection of the Pedricktown Plant. Since the two compliance officers conducting the inspection are industrial hygienists, they intend to concentrate on health problems - specifically mentioned were VCM, acrylonitrile, lead, cadmium, carbon black, and noise.

Following is a summary of their four visits to date:

July 14, 1977

1. Inspectors Lewis and Sowerbutts met with A.R. Webber and D.P. O'Keefe to discuss their intentions and specific interpretations of the VCM Standard.
2. A question regarding appropriate medical surveillance for employees exposed in an emergency was raised. This involved a reported incident (6/28/77) where three employees were exposed to VCM because they failed to utilize respirator protection. We had planned to discuss this with the plant physician on 7/15/77. The inspectors felt that the plant physician should have been contacted immediately. They said they would discuss this with their boss and advise us of the outcome.
3. They showed a particular interest in the training given employees - especially new employees. OSHA FORMS
4. Met with A.P. Moran and C.D. Eisenhart to review 100's, 101's and 102's.
5. Conducted walk-through of tank farm, Mass resin, Pearl/Paste, and the Dryer building. The only comment made during the tour involved respirators hanging on the wall (unprotected) in the Mass resin office.
6. They requested the following information:
 - . Safety procedures pertaining to VCM and Lead
 - . Medical examination policies for VCM and Lead
 - . Plant layout
 - . Process flow diagrams for all processes
 - . Copies of 102's
 - . List of projects undertaken to reduce exposure to VCM

NGC 14321

July 15, 1977

1. Discussed training programs and showed 2 part slide presentation, and locally produced video tapes on VCM training and respiratory protection.
2. Completed walk-through of plant in Compound and Latex. They were visibly concerned about what they saw in compound and commented on the following:
 - . dust coated respirators on 3rd floor desk and lockers
 - . water fountain on third floor
 - . dust inside gloves at weigh booths
 - . dust in lunch room
 - . floor cleaning practices (dry sweep)
 - . noise level around mill

OSHA used one shoulder, and BFG the other, housekeeping in warehouse

3. They requested a summary of personnel monitoring results for the VCM areas demonstrating a reduction, if any, in exposures over a period of time.

BFG RESULTS

1.1-1.52/m, 8 M Filter

August 4, 1977

	WEIGH	6" Lini	.32 mg/m ³	Pb	ADJUSTED %	<.001 Cd
	WEIGH	9" Lini	.03 mg/m ³	.077	.789	<.007 Cd

weighing Cd, only values out of compliance

1. Inspectors Lewis, Sowerbutts, and Hess arrived to conduct lead monitoring in Compound. MIXING 6" Lini 0.16 mg/m³ 0.153 <.001 Cd
MIXING 9" Lini <0.03 mg/m³ <0.028 <.001 Cd
2. Four technicians (2 mixing techs and 2 weigh techs) were monitored for dust (lead) exposure for a duration of 7 hours. We collected parallel samples.
3. When asked how the 8 hr. TWA is determined, Sowerbutts replied that the final result is calculated based upon an 8 hour day. In our case:
$$\frac{X \text{ mg/m}^3 \times 7 \text{ hour sample}}{8} = 8 \text{ hr. TWA}$$
4. Wipe samples were taken from the lunch room table and vending machines, the desk on the third floor, and inside the respirators of the monitored employees after their morning and afternoon breaks. The wipe sample is a qualitative measure of contamination.
5. Photographs were taken of the monitored employees, a dusty respirator, and the water fountain.
6. The proposed lead standard was reviewed along with most recent blood and urine lead level results.

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