

TGG: JEL: ERT: MJH: AJO: RF
XF: Desk

TO: Distribution

FROM: T. G. Grumbles

DATE: March 27, 1991

SUBJ: Safety and Health Audits

Interoffice
Communication

VISTA

Since the February 28th meeting when we discussed the development of a safety and health audit program, a proposal for the development and administration of the audit program was developed and sent to Tom Huffman (Attachment 1). He has approved the general concept and asked the ad-hoc team to become a project team, and proceed. This approval is indicated in Attachment 2, a letter to the plant managers.

An essential part of the development of the audit program is your development of specific modules for the system. This was discussed and agreed to at our meeting on the 28th. The team has determined module assignments. These are indicated on the following pages with specific guidelines on how to develop the modules. Please read these carefully, as we will need to have consistency in content of these modules. Two example modules are attached for your reference. These are examples to illustrate the style and detail desired.

WE NEED THESE ASSIGNMENTS TO BE COMPLETED AND RETURNED TO ME BY MAY 8TH.

The team will then meet to review these for consistency and content, and to develop the full audit program.

VVV 000006215

MODULE ASSIGNMENTS			
		REGULATORY CITATION	POINTS
LCCP	Safety Control Permitting (IV)	*	300
	Emergency Response (VI)	1910, 38, Resp. Care	200
	Hazwoper (III)	1910, 120	100
	Radiation (XIII)	1910.96 and .97	50
	Ethylene Oxide (XI)	1910.1047	100
LCVCM	Safety and Health Training (VIII)	**	100
	General Safety Promotions (XVI)	*	50
	Hearing Conservation (VI)	1910.95	50
	Laboratory Safety/Health (XIV)	***	50
LCLAB	Electrical Safety (X)	1910.301-.308;331-360	100
	Walking/Working Surfaces (XIII)	1910.21; 1910.30	100
	Lighting and Ventilation (VII)	1910.94; *	50
Aberdeen	Mechanical Safety (IX)		250
	Hand & Portable Tools	1910.241-244	
	Compressed Gases	1910.101; 1910.169	
	Welding/Cutting	1910.251-255	
	Machine Guarding	1910.211-219	
	Lifting Devices/Slings	1910.176; 1910.184	
	Material Handling (XII)	1910.176-183	100
	Lead (X)	1910. 1 or 5	100
Okc	Accident Investigation (III)	*	100
	Fire Protection & Training (V)	Subpart L (1910.155-165)	250
	Contractor Safety (XV)	****	100
	VCM (IX)	1910.1017	100
Balt	Asbestos (XII)	1910.1001; 1926.58	100
	General Safety Rules (II)	*	100
	Process Safety (VII)	Draft Regs; Resp. Care	300
	Crane Safety (XI)	1910.179-181	150
Hammond	First Aid (XIV)	1910.151	50

MODULE ASSIGNMENTS

		REGULATORY CITATION	POINTS
	Medical & Exposure Records (IV)	1910.20	50
Houston	Leadership and Administration (I)	*	50
	Health Hazard Identification & Evaluation (I)	*	100
	Hazard Communication (II)	1910.1200	150
	Respiratory Protection (V)	1910.134	100
	Benzene (VIII)	1910.1028	100

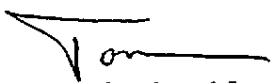
- * These elements are guided by policy and practice. The questions should be developed based on professional judgement consensus standards, and/or responsible care elements if they exist.
- ** Safety and health training requirements covered in specific standards will be evaluated in those modules. This element should be for those items not covered by standards.
- *** This element is not meant to be for the OSHA Laboratory Standard. Plant QC labs are not covered by this standard. This element is for "good practice" elements similar to item * above.
- **** This element is for items not covered in specific standards, such as HAZCOM, and HAZWOPER.

GUIDELINES FOR MODULE DEVELOPMENT

1. Format should be the same as the examples, Resp. Protection and Benzene, attached.
2. Modules should be applicable to any plant. In other words, not based on your plant's practice.
3. Where a regulation applies the questions should closely parallel the sections/requirements of the standard.
4. The questions should be as objective as possible, utilizing yes/no answers where possible. Where professional judgement is required by the auditor for a specific question, please indicate with a (*PJ) designation.
5. Please indicate points for each question based on your impression of the importance of individual questions. Total points per module are indicated in the "assignments" above.
6. Certain questions in each module will require verification by presentation of written programs, etc. or employee interviews. The team will make this indication when reviewing the modules for consistency.
7. Please provide a hard copy of your assignments and a labeled disk (indicate software used please) to me. This will facilitate developing the final product.

We've sent you a lot of information and need a lot of work by May 8th. Please carefully review all the attachments before starting to work. Also, please contact a team member if you have any questions.

Good luck!


T. G. Grumbles

/dlj

Distribution: M. Tonkovich-Hammond, B. Trego-Aber, G. Shirley-LCVCM, R. Gantz-LCLAB

cc: K. Fogg-LCCP, B. White-Balt, M. Lunsford-Okc

PLANT MANAGERS

R. W. Seymour-Aber, L. R. Bauer-Balt, G. D. Williams-Blane, J. Pavao-Hmd, J. Friend-LCCP, J. W. Ware-LCLAB, P. Carrico-LCVCM, H. D. Garrison-Okc, P. L. Foote-Prem, V. W. Weiss-Austin

T. Huffman

VVV 000006218

Draft

RESPIRATORY PROTECTION

MAJOR CATEGORIES
SCORING SYSTEM

	<u>Category</u>	<u>Score Possible</u>
1.	Training	10
2.	Fit/Medical Testing and Records	10
3.	Policy	9
4.	Inspection	9
5.	Selection	8
6.	Maintenance	8
7.	Care	7
8.	Auditing	7
9.	Breathing Air Quality	7
10.	Responsibilities	6
11.	Contractors	5
12.	Work Area Surveillance	5
13.	Emergency Rescue (IDLH)	5
14.	Hose Fittings	2
15.	Prescription Glasses	2
	Total Points	100

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Draft

MEASURE SYSTEM
RESPIRATORY PROTECTION

	Total Points
1. Training	10
a. Are users instructed in the proper use of respirators?	
b. Is training adequate?	
c. Is training performed as required and records kept?	
d. Is training evaluated?	
e. Are users trained in proper selection of respirators?	
f. Can employees demonstrate proper respirator use?	
g. Are employees informed about the necessity of fit testing?	
h. Are employees trained in the proper care of respirators?	
2. Fit + Medical Testing/Records	10
a. Is fit testing required?	
b. Is fit testing performed as required?	
c. Is medical certification required?	
d. Are medical certification records kept?	
e. Is medical certification performed as required?	
3. Policy	9
a. Does the plant have a written policy?	
b. Does the policy meet the requirements of OSHA 1910.134?	
4. Inspection	8
a. Are inspections performed and records kept as required?	
b. Are SCBA inspections performed and records kept?	
c. Are escape respirator inspections performed and records kept?	
d. Are respirators inspected before and after each use?	

VVV 000006220

MATERIAL SAFETY DATA SHEET

Vista Chemical Company
P.O. Box 19029
Houston, Texas 77224

1. PRODUCT IDENTIFICATION

MANUFACTURING SITE	Lake Charles Chemical Plant		
ADDRESS	P.O. Box 727, Old Spanish Trail Rd., Westlake, LA 70669		
TRADE NAME	Quench Solids		
SYNONYMS	Aluminum oxide and hydroxide mixture in water		
CAS NUMBER(S)	Mixture - available upon request		
TELEPHONE NO.	(713) 588-3491	EMERGENCY TELEPHONE NO.	(318) 494-5142

2. COMPONENTS AND HAZARD CLASSIFICATION

LPA Solvent 1-5%
Aluminum oxide and hydroxide 15-18%

3. PHYSICAL DATA

BOILING POINT (°F)	-212	SPECIFIC GRAVITY (H ₂ O = 1)	Unknown
VAPOR PRESSURE (mm Hg.)	Unknown	MELTING POINT	-32°F
SOLUBILITY IN WATER	Insoluble	VAPOR DENSITY	Unknown
APPEARANCE AND ODOR	White, light grey solids in water. Slight hydrocarbon odor.		

4. FIRE AND EXPLOSION DATA

FLASH POINT (TEST METHOD)	Unknown	AUTOIGNITION TEMPERATURE	Not applicable
FLAMMABLE LIMITS IN AIR. % BY VOL.		LOWER None	UPPER None
EXTINGUISHING MEDIA	Non-flammable material. Select media suitable for surrounding fire.		
SPECIAL FIRE FIGHTING PROCEDURES	None.		
UNUSUAL FIRE AND EXPLOSION HAZARD	None.		

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5. HEALTH HAZARD INFORMATION

FIRST-AID

- EYES:** Immediately flush eyes with plenty of water for at least 15 minutes. Get medical attention immediately. Call a physician.
- SKIN:** Flush skin with plenty of water. Remove contaminated clothing. Call a physician if irritation persists. Wash clothing before reuse.
- INHALATION:** If exposed to excessive amounts, remove to fresh air. If breathing has stopped, administer artificial respiration.
- INGESTION:** DO NOT INDUCE VOMITING! Seek medical advice.

NATURE OF HAZARD

- EYE:** In liquid form slight irritation may occur due to solvent content. If dried physical irritation may occur.
- SKIN:** Due to solvent content, repeated or prolonged skin contact may result in irritation and reddening of the skin, progressing to dermatitis. In dried form physical irritation may occur.
- INHALATION:** LPA solvent vapors may cause headache and stupor. If dried, dust may cause physical irritation to upper respiratory tract.
- INGESTION:** Irritation of the stomach and intestines resulting in nausea and vomiting may occur due to solvent content. If dried, negligible hazard is anticipated.

EXPOSURE LIMITS

- For LPA Solvent: Vista recommended PEL: 100 ppm, 525 mg/m³ for 8-hour TWA (Exposure limits for Petroleum Distillate - Stoddard Solvent)
- For Aluminas: ACGIH TLV = 10 mg/m³ of total dust and 5 mg/m³ respirable dust.
- If product is dried OSHA PEL = 15 mg/m³ of total dust; 5 mg/m³ respirable dust.

TOXICITY DATA

This product has not been specifically tested. Data for a similar product is given below.

- EYE CONTACT:** LPA: Primary Eye Irritation Index (Rabbit): Max. average score - 5.0 after one hour (max. score 110)
Alumina: Maximum average Draize score = 7(0-110), minimally irritating.

- SKIN CONTACT:** LPA: Primary Skin Irritation Index (Rabbit): 4.2 out of 8.0
Acute Dermal Toxicity (Rabbit): LD₅₀ 2.0 - 4.0 gm/kg
Alumina: Dermal LD₅₀ >20 g/Kg, practically non-toxic.
Primary dermal Irritation index = 0.0(0-8), not a primary skin irritant.
Not a dermal sensitizer in guinea pigs.

VVV 000006222

- INHALATION:** LPA: No toxicity observed in rats exposed for one hour to 24.1 mg/l.
Alumina: Inhalation of fine particles (6-8 microns dia.) for 4 hours by rats resulted in no signs of toxicity.

- INGESTION:** LPA: Oral LD₅₀ 5 g/Kg, practically non-toxic.
Alumina: Acute oral LD₅₀ in rats: 20 g/kg.

SPECIAL PRECAUTIONS

AVOID INHALATION AND SKIN CONTACT

6. REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY:

None

INCOMPATIBILITY:

None

HAZARDOUS DECOMPOSITION PRODUCTS:

None

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION:

None

7. SPILL OR LEAK PROCEDURES

Absorb spill with inert material, then place in a chemical waste container. For large spills, dike for later disposal. Dispose of according to local, state, and federal regulations.

WASTE CLASSIFICATION: If discarded in its purchased form, this product is not a RCRA hazardous waste. Re-evaluation of the product may be required by the user at the time of disposal, since the product uses, transformations, and mixtures may change the classification.

8. SPECIAL PROTECTION INFORMATION

VENTILATION RECOMMENDATIONS

Small quantities of LPA Solvent may be present. Use mechanical ventilation in enclosed areas when the material is wet. When dried, use mechanical ventilation to control dust levels below the PEL and TLV.

SPECIFIC PERSONAL PROTECTIVE EQUIPMENT

EYES: Chemical safety glasses or goggles.

SKIN: As necessary to avoid prolonged or repeated skin contact.

RESPIRATORY PROTECTION:

Use NIOSH-approved air-purifying dust respirator.

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9. SHIPPING, TRANSFER AND STORAGE**SHIPPING INFORMATION**

This product is not a hazardous material or hazardous substance as defined by the Department of Transportation, nor is it a dangerous good as defined by IATA for air transportation.

TRANSPORTATION AND STORAGE

ELECTROSTATIC ACCUMULATION HAZARD:	None
USUAL SHIPPING CONTAINERS:	Truck, drums
STORAGE/TRANSPORT TEMPERATURE:	Ambient
STORAGE/TRANSPORT PRESSURE:	Ambient
LOADING/UNLOADING TEMPERATURE:	Ambient

HANDLING AND STORAGE MATERIALS AND COATINGS

SUITABLE: Carbon steel

Abrasion in handling systems may occur.

THE ABOVE DATA IS BASED ON TESTS AND EXPERIENCE WHICH VISTA BELIEVES RELIABLE AND ARE SUPPLIED FOR INFORMATIONAL PURPOSES ONLY. VISTA'S PRODUCTS ARE INTENDED FOR SALE TO INDUSTRIAL AND COMMERCIAL CUSTOMERS. VISTA REQUESTS THAT CUSTOMERS INSPECT AND TEST OUR PRODUCTS BEFORE USE AND SATISFY THEMSELVES AS TO CONTENTS AND SUITABILITY. VISTA DISCLAIMS ANY LIABILITY FOR DAMAGE OR INJURY WHICH RESULTS FROM THE USE OF THE ABOVE DATA AND NOTHING CONTAINED THEREIN SHALL CONSTITUTE A GUARANTEE, WARRANTY (INCLUDING WARRANTY OF MERCHANTABILITY) OR REPRESENTATION (INCLUDING FREEDOM FROM PATENT LIABILITY) BY VISTA WITH RESPECT TO THE DATA, THE PRODUCT DESCRIBED, OR THEIR USE FOR ANY SPECIFIC PURPOSE, EVEN IF THAT PURPOSE IS KNOWN TO VISTA.