

Interoffice Communication

To L. B. Decker

From D. D. Palmer

Date June 30, 1977

Subject Administrative Transfer of Environmental Air & Water Programs to the Safety Department and the Laboratory Control Group

Listed below are suggested responsibilities for both the Safety Department and the Laboratory Control Group for maintenance of our Environmental Programs.

I. "Safety Department Environmental Air Responsibilities"

1. Routine Sample Collection - Prepare and update as required a routine air monitoring schedule meeting OSHA requirements and submit same to the Control Group Leader. Collect samples following this schedule whenever possible, otherwise give as much notice as possible of intended sampling to the Control Group Leader..
2. Sample Preparation - Present samples to the laboratory in a manner convenient to the Control Group for analysis, such as the transferring of charcoal from charcoal tubes to sample vials for analysis or transferring absorbing solutions from midjet impingers into two-ounce bottles. Reagents relative to routine analyses (absorber solutions etc.) will be available from the Control Group.
3. Non-Routine Sample Collection - Requests for non-routine analyses and/or projects (e.g. recovery data) should be made to the Laboratory Project Group Leader for priority assignment to a Project Chemist pursuant to his area of responsibility.
4. Pump Calibration and/or Equipment Maintenance - Personnel Dosimeter pumps will be calibrated and maintained by the Safety Department.
5. Record Keeping - Maintain permanent documentation of all environmental air samples in accordance with OSHA regulations. Calculate personnel exposure limits of employees upon receipt of analytical data from the Laboratory Control Group. Example - Benzene personnel dosimeter sample: Both front and back sections of charcoal are submitted in separate vials to the control group for analysis for benzene (milligrams per vial). Results from the Laboratory are then returned to the Safety Department for conversion to mg/m³ utilizing volume data from pump calibrations.
6. Complaints - In addition to duties with respect to the "LOCP In-Plant Response Procedure for Plant Emission Control", assume the duties of the Quality Control Chemist. Should non-routine laboratory assistance be necessary, contact the Laboratory Project Group Leader. Routine area surveys involving Drager tubes, etc., will also be the responsibility of the Safety Department as well as the maintenance of adequate charcoal tube supply for immediate complaint response.

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II. "Laboratory Control Group Environmental Air and Water Responsibilities"

- A. Environmental Air Program - The control group will furnish the following routine analytical data to the Safety Department by schedule or request. A log sheet should be prepared by the Control Group Leader for both air and water analyses for distribution of results.

1. Gas Chromatographic Analyses

- | | |
|------------|--------------------|
| a) Benzene | c) Methanol |
| b) Butanol | d) Methyl Chloride |

2. Dust Sampling Analyses

- a) Alumina
b) Calcium hydroxide

3. Colorimetric Impinger Methods - Reagents will be stocked and available to Safety Department upon request.

- a) Ammonia

B. Environmental Water Program

1. The Control Group will furnish analytical data to the Director of Environmental Control regarding water analyses.
2. The Control Group Leader will issue a monthly report summarizing water pollution data for said month.
3. The Control Group will maintain an EPA ledger indicating results of all EPA sampling as required by our NPDES Permit.

III. "Training"

Safety Department personnel will be instructed as to proper pump calibration, record keeping practices, and exposure calculations by a member of the Laboratory Project Group. Laboratory Shift Supervisors will be instructed regarding particulars of new methods transferred to the Control Group by a member of the Project Group.

Should you have questions, please advise.



D. D. Palmer

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cc: DDZ

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