

PLAINTIFF'S
EXHIBIT
DUP-1870

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INDUSTRIAL HYGIENE PROGRAM

P&CN AREA

1ST THRU 4TH QUARTER 1982

BEC:mgg

DUP 0814432

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INDUSTRIAL HYGIENE PROGRAM

P&CN AREA

1ST THRU 4TH QUARTER, 1982

OVERALL PROGRAM

The general I/H goal in the P&CN area is the elimination of personnel exposure to harmful area chemicals, dusts, and noise levels.

SPECIFIC PROGRAM ITEMS

1. Signs & Labels

Goal: Have all hazardous locations and areas that have been identified, marked by appropriate signs. This goal will be complete by the third quarter of 1982.

Status: Locations, such as waste gas condensate facilities, have been identified by the 1981 Power Process Hazards Survey as needing hazard warning signs. Signs have been ordered and will be installed when received.

2. Task & Area Monitoring

Goal: Continue the current practice of monitoring HCN concentration prior to and during each vessel entry for vessels handling HCN or NaCN bearing streams. This monitoring practice is considered sufficient to guarantee minimal personnel exposure to HCN because vessel entry is our worst case HCN exposure. Area monitoring in 514 building for NH3 will be conducted and completed during the second and third quarters of 1982. Task monitoring for vinyl acetate during vinyl acetate dumpster handling will be completed by the fourth quarter of 1982.

Status: HCN monitoring is done prior to and during each vessel entry to insure that HCN exposure is below the required 5 ppm limit. No NH3 monitoring was done in 514 building during 1981. Previous survey (8/79) indicated a ground level instantaneous concentration of 50 ppm while purging a building NH3 vaporizer. Engineering steps have been taken to eliminate this problem. The vinyl acetate monitoring planned will be the initial monitoring for this chemical in the P/CN area.

3. Noise Monitoring

Goal: Continue annual monitoring of noise levels in the P&CN area and enforce the use of protective equipment in

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those areas designated as requiring ear protection. The annual noise survey will be complete by the fourth quarter of 1982.

Status: Noise surveys are conducted annually and ear protection areas are designated based on the result of these surveys. The wearing of ear protection is required and enforced within any designated ear protection area.

4. Contractor Safety

Goal: To have no contractor injuries or exposures to area chemicals.

Status: All outside contractors receive an orientation concerning safety and material aspects of the P&CN area. This orientation is conducted in a one-on-one basis by the Day Foreman and the use and care of personal protective equipment is emphasized. Standby personnel are provided when the job dictates.

5. Employee Training

Goal: Continue to make all I/H communications and data available to all personnel in the P&CN area. To support this I/H education, all Production shift groups will be required to continue to devote at least one safety meeting per quarter to the discussion and review of I/H matters pertinent to the P&CN area.

Status: As new information becomes available concerning chemicals handled on the Victoria site, it is communicated to all Production personnel in the P&CN area. Records of this new information and of communication are kept in the P&CN I/H notebook. The P&CN I/H notebook is kept in the P&CN Foreman's office and is available to all employees in the P&CN area for reference.

6. Odor Reduction

Goal: Reduce or eliminate all odor sources in the P&CN area.

Status: The odor receiving primary attention in the P&CN area is NH_3 . Work has been completed that will eliminate NH_3 vaporizer blowdown from the 514 building west sump which will eliminate the major source of NH_3 odor in P&CN. A procedure is available and has been included in the area Operating Guides, the area safety manual, and the area I/H notebook instructing personnel on how to handle new odor sources so that immediate exposure may be minimized and so that engineering attention may be directed toward elimination of the source if necessary.

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7. Risk Appraisals

Goals: Update file of risk appraisals on chemicals used in the P&CN area. This will be a continuing program, per Industrial Hygiene Procedure #11.

Status: Some area chemicals do not have risk appraisals and other risk appraisals that exist need updating and revising. The area proprietor and I/H coordinator have the responsibility to accomplish this goal.

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