

FROM: J. E. DeGRAFENREAD
TO: T. B. BONNEY
Page Two
1977-05-03

In the past, the industrial hygiene program has faltered, in Dr. Jones' opinion, because of the lack of consistency in identifying and quantifying exposures and the development of surveillance programs and formulation of policies resulting from those activities. Activities tended to be conducted on an ad hoc basis, resulting in a "fire fighting syndrome" rather than program formulation and implementation. One reason for this situation is that the industrial hygiene function at Point Comfort has assumed responsibility for testing vessels for combustible gases and oxygen deficiency prior to confined space entry. During the month of January, 1977, about 27 such tests were made with all results yielding 0.0% combustible gases and 21% oxygen. In two instances, excessive CO was found, but this condition was eliminated after purging. It is my feeling that routine testing of vessels for confined space entry is an improper function for Industrial Hygiene. If direct reading instruments and/or detector tubes can be used to assess the safety of a vessel before entry, maintenance personnel can be trained to make the required checks under the direction of the supervisor as prescribed in Engineering Standard 18.1. Only if the vessel has contained especially hazardous or toxic materials requiring the use of special chemical tests, should the services of the industrial hygienist be required. None of the vessels tested on reports I have seen from Point Comfort Operations, fall within this category.

Dr. Jones feels, and I concur, that the imposition of confined space entry testing on industrial hygiene makes it impossible to implement an effective industrial hygiene program because these demands require that either the industrial hygienist or technician respond to requests at unscheduled times. This prevents them from proceeding with routine monitoring and surveillance programs which would be more meaningful in terms of identifying and cataloging industrial hygiene exposures and implementing control measures necessary for the protection of employee health.

I am recommending to Dr. Jones that he talk with Safety to work out an agreement as to how this confined entry testing can be accomplished without involving industrial hygiene, except perhaps for training individuals in the proper use of instrumentation.

J. E. DeGRAFENREAD

cc: Dr. Milton F. Jones - Point Comfort ✓