

Reply to Lee v MSA et al Interrogatory of August 1989

Interrogatory #8

From 1976 to present, please state the types, models and serial numbers of all single-use disposable respirators, half-mask dust respirators and air-fed hood respirators along with the manufacturer and vendor of each, that were purchased by Shell and provided to independent contractors or Shell employees involved in sandblasting operations on the premises.

Answer

To our knowledge no respiratory protection of any type were routinely provided to independent contractors engaged in sandblasting at the Deer Park Manufacturing Complex from 1976 to present. Independent contractors performing sandblasting have been expected to provide their own equipment including respiratory protection.

Respiratory protective devices purchased and solely supplied to Shell employees engaged in sandblasting include:

- 3M 9920 dust masks
- MSA 1/2 mask and Scott 1/2 mask respirators with high efficiency filters
- Mc Donald air fed hood
- Cesco air fed hood.
- Encon sandblast hood
- E.D. Bullard 77-sh-m1 (used since 1987)

Interrogatory #9

From 1972 to present, please state the dates of all air sampling tests which were taken at the Shell Oil and Chemical plant refinery for the purpose of monitoring ambient-free silica during any on-site sandblasting operation. Specifically, please state the date of each test, the person who carried out the test(s) and the identity of the locations where the tests were taken.

Air sampling was conducted within the Deer Park Manufacturing Complex on the following occasions:

September 1974

Survey of Shell sandblasters at the Refinery sandblast yard by David Atwood (Shell Industrial Hygienist).

October 1975

Survey of Shell sandblasters at the Refinery sandblast yard by Jerry Ransdell (Shell Industrial Hygienist).

November 1975

Air sampling done by J.D. Ransdell, Shell Industrial Hygienist

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Various monitoring 1976

Monitoring conducted in January, November and December

October 1978

Survey of non-silica grit silica exposure by
G.L. Buchanan, Shell Industrial Hygiene Assistant
to verify that silica exposure did not exist

Interrogatory #10

From 1972 to present, did Shell Oil Company establish and/or implement written standard operating procedures for the selection and use of respirators for any person involved in sandblasting operations while on the premises of the Shell Chemical & Oil Plant? If so, please state:

- a) The date(s) these guidelines were established
- b) The date(s) they were changed or modified, and
- c) The identity of all persons responsible for promulgating such procedures and/or guidelines.

Answer

Written operating procedures for the selection and/or use of sandblasting respirators by Shell employees have been established for many years. When revised, the original document typically has not been retained.

Only "approved" blasting hoods were reportedly used by Shell sandblasters at the Deer Park Manufacturing Complex. A change in hoods was made in 1975 following an Industrial Hygiene study conducted by D.P. Atwood.

<u>Date</u>	<u>Procedure/Document</u>	<u>Author</u>
<u>1976</u>	<u>Silica Safety Bulletin</u>	<u>Health & Safety Dept</u>
<u>1978</u>	<u>Respirator Safety Order</u>	<u>Health & Safety Dept</u>
<u>1978</u>	<u>Silica Safety Bulletin #2</u>	<u>Health & Safety Dept</u>
<u>1980</u>	<u>Respirator Safety Order</u>	<u>Health & Safety Dept</u>
<u>1984</u>	<u>Guideline for Inorganic Lead and/or Chromate Exposure Potential</u>	<u>Health & Safety Dept</u>
<u>1984</u>	<u>Requirements established for A322 tank job</u>	<u>Health & Safety Dept</u>
<u>1984</u>	<u>Guidelines for Blasting Inside Tanks</u>	<u>Health & Safety Dept</u>
<u>1986</u>	<u>Respirator Safety Order</u>	<u>Health & Safety Dept</u>

(Copies are provided for those underlined)

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