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SUMMARY OF OSHA/EPA INSPECTION QUESTIONNAIRE

The following is a summary of the 26 responses to the OSHA/EPA Inspection Questionnaire:

1. Do you have, for your supervisors and other employees, a written set of guidelines for use when a regulatory agency inspector arrives at the plant gate?

Yes 15 No 11

2. Have you had either an OSHA or EPA inspection of your plant in the past 12 months:

OSHA 10 EPA 18 None 7

3. If you had an OSHA inspection was it regarding the VCM standard or was it involved with another area?

- a. VCM standard (five responses)
- b. VCM, noise, heat, dust lead
- c. General - triggered by employee complaint

4. If you had an EPA inspection, was it regarding NESHAPS-VCM or was it about something else?

Typical response:

- a. NESHAPS
- b. NPDES permit
- c. Hazardous waste - RCRA
- d. Permit to burn coal
- e. Landfill permit
- f. Incinerator operation
- g. PCB's
- h. PVC dust
- i. Safety relief valve discharges

5. Did you receive any citations or notices of violation? If you wish, could you please describe the nature of the violation?

Typical response:

- a. Notice of violation - improperly labelled PCB tank
- b. No violation but not satisfied with aqueous effluent sampling procedure
- c. Two OSHA citations on record keeping - one invalid - the other due to math error in number of injuries reported

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- d. OSHA citations: Inadequate maintenance on area monitoring equipment and working in an area with greater than 5 ppm VCM, not wearing respirator
 - e. OSHA - serious and fine; other and no fine
 - f. OSHA - High VCM levels in reactors during cleaning - no respirator
 - g. Incomplete compliance with VCM opening loss regulations and non-compliance with relief valve emissions even though all emissions were reported correctly and on time.
6. Could you give a brief summary of your recent experience with an OSHA or EPA inspection?

Typical reponse:

- a. OSHA inspection included 3 days of personnel monitoring for VCM and 1 day of PVC dust monitoring and other visits to the plant
- b. EPA was in the area and noticed black smoke from the incinerator stack and demanded an immediate inspection of the facility. We obliged and corrected the problem - also sent a letter to the EPA explaining the problem.

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