PLAINTIFF'S EXHIBIT
DUP-519

circulate to Supervisor 2/5/82

E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
VICTORIA PLANT
VICTORIA, TEXAS

PETROCHEMICALS DEPARTMENT

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December 16, 1981

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OCCUPATIONAL HEALTH SURVEY REPORT

RESPONSE TO REPORT (NO. 1069-H) OF OCTOBER 7, 1981

The following is a summary of Victoria Plant's response to the recommendations contained in the subject report and in the field notes developed during the survey. Response to each Survey Report recommendation is noted along with appropriate comments. In the case of field notes, we have commented only on those for which we have taken some exception.

Survey Report Recommendation

I. Communications

A The initial carcinogen communication is well documented but scope of training and documentation of annual retraining is difficult to reconstruct from the information on hand.

Response: Accepted. A computerized system to document occupational health training programs and communications is being developed and should be on line by mid-1982. Required training has been identified and will be reviewed for adequacy by April 1, 1982.

II. Protective Equipment, Respirators

A Disposable respirators should remain sealed in plastic until placed in service to prevent dust accumulation.

Response: Accepted. Written instructions will be posted in respirator storage boxes to keep masks sealed in plastic.

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B. It is recommended that compliance plans be completed and reviewed annually with the goal of reducing routine respirator usage where feasible.

Response: Accepted. Sample compliance plans have been made available through the industrial hygiene coordinators. Compliance plans will be written where respirators are used. The I/H Committee will audit for compliance plans during its regular local I/H audits.

III. Exposure Hazards

A It is recommended that the mechanical area actively pursue their monitoring program for welding fumes to match the effort in other plant areas.

Response: Accepted. The need for developing more welding fume data has been recognized for some time. The priority attached to getting this work done has been less than that of many of the monitoring efforts in process areas. As these tasks are completed, resource people will be available to develop the necessary data. Monitoring for welding fumes will be pursued extensively in 1982.

B. It is recommended that asbestos-free insulation be labeled to distinguish it from asbestos to provide ease of handling and replacement.

Response: Accepted in principle. Our plans are to designate entire areas as non asbestos where asbestos is not used (Example: ADN Modernization). In older plant areas we will use non asbestos labels where insulation is replaced. Where there is no label, we will treat as asbestos.

C. The plant should establish contacts with C&P Department to determine if they could benefit from their formaldehyde pump seal studies.

Response: Accepted. We are making a concerted effort to improve mechanical seal performance. In addition to our work with various mechanical seal vendors, we are taking advantage of Company experience such as the mechanical seal studies conducted by Chemicals and Pigments Department.

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D. With the exception of the "J" unit additive system, adipic loading vent system, and a portable welding unit, exhaust systems are monitored at least annually. It is recommended that these items be added to the program.

Response: Accepted. The portable vent system used in the machine shop will be added to the list of equipment for annual exhaust monitoring. For the "J" unit additive system and the adipic loading vent system, the original design basis will be determined, a technique for monitoring the air flow will be developed, and the air flow monitored annually.

IV. Emergency Procedures

A. It is recommended that the plant establish criteria to adequately address OH concerns in spill control procedures.

Response: Accepted. An industrial hygiene procedure. No. 20, is being prepared by the I/H Subcommittee of the Central Safety Committee. The procedure will address the issues of major vs. minor spills, and other aspects of the problem.

V. Noise

A. It is recommended that compliance plans be developed for abating present noise sources.

Response: Accepted. Sample compliance plans have been made available to all industrial hygiene coordinators. The I/H Committee will continue to audit for compliance plans during its regular local I/H audits.

VI. Previous Report

A. All the recommendations of the previous report (No. 9064-H) have been satisfactorily addressed except for:

1. Documentation of key OH items with employees annually, primarily for carcinogen and embryotoxin communications.

Response: Accepted. A computerized system to document occupational health training programs and communications is being developed and should be on line by mid-1982.

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2. Develop a comprehensive compliance plan for respirator usage.

Response: Accepted. Sample compliance plans have been made available to all industrial hygiene coordinators. The I/H Committee will continue to audit for compliance plans during its regular local I/H audits.

Field Note Recommendations

Corrective action has been taken or is in progress on all field note items, with the following exception:

2. Welder's Mask

The 3M 9920 disposable mask is supplied to welders for use when working on galvanized (zinc coated) metals. Engineering Standard H1U, Table 1, recommends the use of supplied air respirators (air line respirators) when needed for indoor and confined area welding. The plant should review their current use to determine if it is appropriate.

Response: Welding on galvanized steel has been nearly eliminated from the shop. Each welder who uses a 9920 disposable respirator is being quantitatively fit tested and must achieve a protection factor of ten or higher. No complaints of zinc fume fever have been received since the 9920 has been in service. A procedure for monitoring zinc oxide fume is complete; and, if the results of the monitoring confim earlier tests that the zinc fume does not exceed the 5 mg/m^3 TLV, we plan to continue use of the 9920 mask. It has been approved by NIOSH for fumes of the type experienced during the welding of galvanized metal.

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