

TEX-136



JCO

file SAF-1H-PSP
Tetaw USA
Pugot Sound Plant

Copy to
JNN

DATE: September 5, 1984
TO: Mr. C. R. Ferguson
FROM: Mr. Robert A. Cox
SUBJECT: SAF-INDUSTRIAL HYGIENE
PROGRAM EVALUATION

SAFETY & INDUSTRIAL HYGIENE			
OCT. 1984			
JRS			
OWR			
ODR			
DLMEK			
JHB			
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CAM			
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		DESTROY	

Please refer to our May 29 subject memo and the attached concerning refinery visits by our staff and an industrial hygienist of the Research Environment and Safety Department (RES-D). We would like to schedule such a visit October 9 through 11. If you prefer alternate dates please contact our Mr. Don Slack (phone 713-650-5037).

Your staff should prepare to discuss the attached questions with the survey team.

DES/jls

R. A. Cox

Attachment

RHH

B → JDW 10/2/84

WA-TEX 001490

1. What respiratory protection is required for hydrogen sulfide ?
2. For asbestos ?
3. For welding in confined spaces?
4. How often is each employee formally trained/retrained in respiratory protection use ?
5. Who issues respiratory protection ?
6. Who is responsible for cleaning respirators ?
7. Who is responsible for storing and maintaining respirators ?
9. Are respirators provided if requested by employees even if not required for a certain task ?
10. Has the breathing air supplier provided a document certifying the quality of breathing air ?
11. Are any routine analysis performed on breathing air received ?
12. How often is sampling for asbestos performed ?
13. How many industrial hygiene samples were collected by refinery staff in the previous twelve months ?
14. Is any computer system used locally to record or analyze industrial hygiene sampling data ?
15. Which employees receive annual hearing tests ?
16. Who advises employees of the results of hearing tests ?
17. Are employees advised of the results of hearing tests in writing ? Within how many days ?
18. Who trains employees to use ear protection ? How are insert type devices initially fitted ?
- 18A. Who advises employees of the effect of noise on hearing ? How often is such training provided ?
19. Who is responsible for performing noise contours ? When was the last contour performed ?
20. How many PCB contaminated electrical devices are present at the facility ? Are such devices stored at the facility ?
21. Is a current inventory and inspection record of PCB equipment available ?

22. When were designated persons last trained concerning TSCA 8(e) notification ?
23. Who is responsible for recording TSCA 8(c) allegations ?
24. Have any TSCA 8(c) allegations been made in the previous year ?
25. Are MSDS currently available on operating units ?
26. Have lists of products, additives, process streams, catalysts, chemicals, etc., been prepared for all materials present in the refinery ? On each process unit ?
27. Has a written hazard communication program been prepared for the facility ?
28. How often is each employee formally trained concerning hazard communication ? Informally trained?
29. Is all safety equipment required by the Company provided at no cost to the employee ?
30. Is a written contractor safety program currently in use at the facility ?
31. Are pre-job meetings held with all contractors ? Pre-bid meetings ?
32. Are contracts reviewed by facility health and safety staff before being let ?
33. Are contractors required to submit first reports of injury ? Injury or illness records ?
34. Is health or safety equipment provided for the contractor's use ?
35. Are any licensed radioactive source materials present at the facility ? If so how many ? Who is responsible for control of these materials ?
36. Are continuous monitors required during all work in confined space ? For all hot work ?
37. What tests are routinely performed before permitting initial entry to clean a leaded gasoline storage tank ?
38. Are supplied-air respirators required for all tank cleaning jobs ?

39. Estimate the percent of industrial hygiene and safety staff time allocated to the following (total must be 100%) :

Staff work

Complaint/ accident investigation

Plant inspection

Training

Insurance claims/ loss control

Issuing permits/ inspecting permitted jobs

Industrial hygiene sampling

Litigation

All Other

40. Are employees advised of sampling results in writing ?

41. Are employees provided access to their personal medical and exposure monitoring records on request ?

42. Is exhaust ventilation required while welding in confined space ?

43. How often are lab hood face velocities measured ? What is the minimum acceptable face velocity for hoods ?

44. Are any staff members Certified Safety Professionals ?
Certified Industrial Hygienists ?

45. Are any employees required to periodically take chest x-rays ?
Pulmonary function tests ?

46. How often do employees exposed to TEL provide urine samples for medical evaluation ? Which employees are included in this program ?

THE FOLLOWING QUESTIONS CONCERN SERVICES PROVIDED TO THE PLANT

47. Are your requests for industrial hygiene information/assistance handled in a timely manner ? Are responses consistently satisfactory ?

48. List the type of assistance requests you expect to make in the near future ?

49. Are industrial hygiene sampling data reports forwarded in a timely manner ?

50. Do you find that the report recommendations identify priority needs ?

51. Do reports provide useful guidance and solutions for program needs ?

52. Are the training aids provided consistently useful ?

53. List your priority training needs for the near future ?

54. Has manpower assistance been requested in the past year to perform industrial hygiene or safety tasks for this facility ? Do you expect any such requests to be made this year ?

55. Is information concerning regulatory activity forwarded in a timely manner ? Are regulatory reviews satisfactory ?

8/84