



Dow U.S.A.

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OSHA Star Recertification - Industrial Hygiene Summary

We were very pleased to receive the recommendation for OSHA Star Recertification on April 16, 1993 following OSHA's VPP week long visit. It is very significant that there were no Industrial Hygiene related items that needed to be corrected within a 90 day period. We feel that the Industrial Hygiene OSHA Compliance Officer was favorably impressed with our I.H. program. This was very important considering the short time element because he mentioned that under a compliance inspection they would spend three to four months in a plant.

The purpose of this communication is to share several of his comments where we could promote opportunities to improve. Although these were specific observations, they could have Division-wide application.

1. Review dust exposure monitoring results particularly where the "respirable" fraction is important. Focus on task related activities and include the housekeeping/clean-up part of the job where dust can easily become airborne. Avoid using air pressure hose to clean oneself.

Sandblast cabinets need to have dust collection system on the exhaust air. Operating and clean-up procedures should note required PPE if necessary.

2. Repair damaged insulation. Because we have elected to use the Plant Asbestos Inventory List, it is sometimes difficult for the worker to identify damaged asbestos insulation in the field and avoid exposure to potentially friable asbestos. From his past experience it was more common for him to see asbestos labeled (or otherwise marked) in the field.

The Division Emergency Plan does address locations (by block) of asbestos insulation where the potential for friable asbestos could occur in case of a significant event (i.e., an explosion or fire which could expose large segments of insulation). Further precautions should be added to the Plan such that if anyone entering the affected area will be required to wear respiratory protection until airborne asbestos levels are acceptable.

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3. Do all of our block emergency plans adequately address the scenario where a lone operator works in a remote area? Would the acute effects of a high chemical exposure render the individual unable to take defensive action?
4. He reminded us that contractors have to be fully accountable for the health and safety of their employees. This includes having the required written programs and documentation, provide detailed training and ensure that exposure monitoring is conducted and proper PPE is worn or control measures taken. If there is a contract employee complaint, OSHA will require this information from the contractor employer and the idea that "Dow will take care of us" is not sufficient.
5. He emphasized the importance of communicating the hazard noted on the MSDS rather than just directing persons to the MSDS location. He did look at the HAZCOM/MSDS notebooks and reviewed several MSDS(s). During the plant tours he was attentive to container labeling and particularly the smaller jugs and drum items.

I wanted to add a few of my observations that I believe had an impact on his impressions which again I felt was important considering the short visit here.

- a. Before the tours, I explained the concept and workings of the I.H. Manuals. When we visited a plant he would review the I.H. Plant Manual (or the Chemical Hygiene Plan Manual in the cases of research) and could see that the required written programs were in place and that there was consistency from one plant to another.
- b. He asked several times if we monitored a particular job and we could verify that by showing the data tables from the Annual I.H. Report. We also had four boxes of reports in the Conference Center where he could thumb through and see that all of the plants were covered. I think he felt we were doing a good job with employee exposure monitoring.
- c. It was clear that the underlying technique used during this visit paralleled a compliance inspection (without the threat of citations). Since we also used a similar format in our Occupational Health Audit in the Consolidated Audit Process we knew what to expect and were prepared.
- d. During our opening presentation, we explained our interest and emphasis of hearing conservation (both on and off the job). Also it was evident with the Standard Threshold Shifts on the OSHA 200 Log. When we went to the plants, he could readily see the dedication to the use of mandatory hearing protection (i.e., put it on when leaving the control room, the signs posted in the work area and seeing other people in those areas wearing hearing protection.

I would like to relate a final parting shot about noise exposure.

He mentioned he was doing a compliance inspection one time and had a noise dosimeter on a worker. When the person broke for lunch, he looked at the dosimeter reading the average noise level for the morning was 94 dB(A) TWA. When the person returned to work an hour later (the dosimeter was worn during the lunch period), the average noise level jumped to 104 dB(A) TWA. The person drove off-site for lunch and was listening to the boom box in the car. - Where have we heard that one before!!

There is no doubt that a lot of hard work went into the preparation for re-certification. This is something that can not be done in the last six weeks (even though there was the final push to make sure everything was just right). It took three years to prepare for this OSHA visit and the efforts paid off.

My thanks to all of those involved.

Regards,



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