

I N T E R O F F I C E M E M O R A N D U M

Date: 23-Mar-1993 10:25am EDT
From: Jan Suhay
SUHAY, JAN
Dept: D/5450
Tel No: 216 447-7690

TO: LAUBACHER, DAVE
TO: DESJARDINS, ROBERT
CC: BOB GRAHEK

(LAUBACHERD@DPK100@MRGATE)
(DESJARDINSR@DPK100@MRGATE)
(GRAHEK, BOB)

Subject: WHO HAS IT?

IS IT YOU OR DO I HAVE IT?

YOUR INITIAL RESPONSE TO THE DEER PARK SAFETY AND HEALTH;
INDUSTRIAL HYGIENE AUDIT, CONDUCTED ON NOVEMBER 9-12,
1992 SEEMS TO BE MISSING.

IF YOU COULD FORWARD A COPY TO HERM WALTEMATE, THAT WOULD
BE GREAT.

THANKS MUCH, JAN

CC: HERM WALTEMATE

NGC 13232

HYGIENE ITEMS

H-1992-5 WE HAVE COMPLETED MONITORING FOR VINYL CHLORIDE, LEAD, DUST, TIN AND NOISE, OTHER EXPOSURES NEED TO BE MONITORED FOR. THEY ARE:

- A. ANTIMONY
- B. CADMIUM
- C. CHROMIUM
- D. TITANIUM DIOXIDE

EXPECTED COMPLETION OF THE ABOVE MONITORING IS 4/93.

H-1992-6 ESTABLISH A CROSS CHECK PROCEDURE FOR ANALYSIS OF ENVIRONMENTAL MONITORING SAMPLES. CURRENTLY WORKING WITH LAB TO SET UP A PROCEDURE - EXPECTED COMPLETION - 6/93.

H-1992-7 DEVELOP A WRITTEN PROGRAM TO COMPLY WITH IH-204, "PROTECTION OF POTABLE WATER SUPPLY" AND IMPLEMENT IT. EXPECTED COMPLETION - 12/93

③ *monitors*

F. ASBESTOS MANAGEMENT

1. OTHER THAN TRANSITE BUILDING SIDING, NO KNOWN ASBESTOS CONTAINING MATERIAL IS IN THE DEER PARK PLANT.

G. ADDITIONAL ISSUES

1. FLAME RETARDANT WORK CLOTHING - THE MAJORITY OF THE HOUSTON PETRO-CHEMICAL INDUSTRY WORKING WITH HYDROCARBONS AND FLAMMABLE MATERIALS ARE CURRENTLY SUPPLYING FLAME RETARDANT CLOTHING. SHOULD THE DEER PARK PLANT ELECT TO DO SO WE CAN EXPECT THE COST TO BE \$70,000.00 - \$80,000.00.
2. WITH THE CURRENT DEER PARK EXPANSION PROJECT ON HOLD, FUNDING WILL NOW BE REQUIRED TO BRING THE CURRENT VCM RECLAIM TANKS UP TO SA-132 COMPLIANCE. APPROXIMATE COST \$125,000.00.

I N T E R O F F I C E M E M O R A N D U M

Date: 11-Jun-1993 11:16am EDT
From: Jan Suhay
SUHAY, JAN
Dept: D/5450
Tel No: 216 447-7690

TO: DESJARDINS, ROBERT (DESJARDINSR@DPK100@MRGATE)
CC: BOB GRAHEK (GRAHEK, BOB)
Subject: DRPK - AUDIT FOLLOW-UP

BOB:
JUST WANTED TO REMIND YOU THAT THE DEER PARK AUDIT
FOLLOW-UP RESPONSE IS DUE JUNE 23RD. PLEASE FORWARD YOUR
RESPONSE TO BOTH THE SAFETY AND HEALTH PLUS THE
INDUSTRIAL HEALTH REPORTS TO HERM WALTEMADE. PLEASE ONLY
INDICATE THE STATUS OF ITEMS NOT YET COMPLETE.

THANKS MUCH, JAN.

cc: Herm Waltemate

Deer Park

Reid
July 1993

HW
RJG
mmm
JS

II. Items from 1990 IH Audit

IH-1990-1 Raw Materials are not all labeled with hazard information labeled. This is a divisional problem which is being handled now. You will be advised of actions required by your facility. This item will be designated as IH-1992-2.

III. 1992 Items To Be Corrected

IH-1992-1 For Information Only: Product specific MSDS were not available for each vinyl resin and compound. This is an issue that is being corrected on a divisional level. As you receive Product MSDS you should continue to add them to the MSDS books in addition to updating the books index.

IH-1992-2 OSHA 29 CFR 1910.1200 (f) (5), Hazard Communication, requires that each container of Hazardous Material be labeled. The following items must be corrected:

a. Harco and Air Products PVA at the Solution Deck need to be Hazard Labeled.

b. The Vinyl Reclaim Storage Tank should be labeled the words "Vinyl Chloride".

Please advise your time table for correction of these items.

Response

OUR CLEVELAND PURCHASING GROUP NEEDS
TO STRESS TO OUR SUPPLIERS THE
IMPORTANCE OF LABELING "EACH" BAG.

Status

☒ Complete
☐ In-progress
☐ No Action

deg
12/10/92
auditdp.92f/4

NGC 13235

IH-1992-3

Although your Respirator Program is very good we found a chlorine escape mask, on the first level, and several half masks, in the Poly Control Room, that need to be properly cleaned or stored.

Response

Status

☒ Complete
☐ In-progress
☐ No Action

IH-1992-4

IH-101 "Ventilation Section" deals with ventilation equipment designed for control of health hazards and requires annual ventilation flow and maintenance checks which are documented. Engineering Standard "ST-411" gives engineering and design standards for ventilation equipment. This item could be added to your maintenance PM system.

Please advise me your method for handling this matter and the time table for initiation.

Response

Status

☒ Complete
☐ In-progress
☐ No Action

deg
12/10/92
auditdp.92f/5

NGC 13236

IH-1992-5

Although you have done an excellent job of monitoring for vinyl chloride, lead, dust, tin and noise, a number of other exposures need to be monitored for. They are:

- a. Antimony
- b. Cadmium
- c. Chromium
- d. Titanium Dioxide

Please advise your time table for completing this item and when it has been completed.

Response

COMPLETED BY WHITAKER TECHNICAL SERVICES
ON 2/22 AND 24. RESULTS PART OF
SEVERAL OTHER REPORTS.

Status

☒ Complete
☐ In-progress
☐ No Action

IH-1992-6

You need to establish a Cross Check Procedure for analysis of Environmental Monitoring Samples.

Please advise when this procedure has been implemented.

Response

COMPLETE - SAMPLES SENT TO HITH LAB
AND BRECKSVILLE LAB - CROSS CHECK
INDICATES SAME RESULTS.

Status

☒ Complete
☐ In-progress
☐ No Action

deg
12/10/92
auditdp.92f/6

NGC 13237

IH-1992-7

You must develop a Written Program to comply with IH-204, "Protection of Potable Water Supply" and implement it.

You have your water sources marked as "Water". The systems should be marked "Non-Potable Water" or "Factory Water" in order to minimize the likelihood of human consumption.

Please advise when the program has been written and when it has been implemented.

Response

NON - POTABLE LINES HAVE BEEN IDENTIFIED.

Status

☒ Complete
☐ In-progress
☐ No Action

IH-1992-8

The ventilation in the Lab Hood has been checked and the hood is labeled correctly. The Hood however needs to be detuned to 100 fpm maximum face velocity.

Response

COMPLETE - MAINTENANCE INSTALL A
NEW SHEVE

Status

☒ Complete
☐ In-progress
☐ No Action

deg
12/10/92
auditdp.92f/7

NGC 13238

ED
JOHN
HEARN
JAN

Rec'd 2-11-94

Industrial Hygiene

II. Items from 1990 IH Audit

IH-1990-1 Raw Materials are not all labeled with hazard information labeled. This is a divisional problem which is being handled now. You will be advised of actions required by your facility. This item will be designated as IH-1992-2.

III. 1992 Items To Be Corrected

IH-1992-1 For Information Only: Product specific MSDS were not available for each vinyl resin and compound. This is an issue that is being corrected on a divisional level. As you receive Product MSDS you should continue to add them to the MSDS books in addition to updating the books index.

IH-1992-2 OSHA 29 CFR 1910.1200 (f) (5), Hazard Communication, requires that each container of Hazardous Material be labeled. The following items must be corrected:

a. Harco and Air Products PVA at the Solution Deck need to be Hazard Labeled.

b. The Vinyl Reclaim Storage Tank should be labeled the words "Vinyl Chloride".

Please advise your time table for correction of these items.

Response

GEON PURCHASING NEEDS TO SPECIFY LABELING
REQUIREMENTS TO RAW MATERIAL SUPPLIERS.

A - COMPLETE

b - COMPLETE

Status

☒ Complete
☐ In-progress
☐ No Action

deg
12/10/92
auditdp.92f/4

7 complete

NGC 13239

IH-1992-3

Although your Respirator Program is very good we found a chlorine escape mask, on the first level, and several half masks, in the Poly Control Room, that need to be properly cleaned or stored.

Response

ON-GOING - PLANT WIDE. ANNUAL TRAINING
(12/93) ON RESPIRATOR USAGE AND CARE.

Status

☒ Complete
☐ In-progress
☐ No Action

IH-1992-4

IH-101 "Ventilation Section" deals with ventilation equipment designed for control of health hazards and requires annual ventilation flow and maintenance checks which are documented. Engineering Standard "ST-411" gives engineering and design standards for ventilation equipment. This item could be added to your maintenance PM system.

Please advise me your method for handling this matter and the time table for initiation.

Response

MAINTENANCE CHANGE SHEAVE ON VENTILATION
BLOWER.

LAB VENTILATION IS CURRENTLY ON A
PM SYSTEM.

Status

☒ Complete
☐ In-progress
☐ No Action

deg
12/10/92
auditdp.92f/5

NGC 13240

IH-1992-5

Although you have done an excellent job of monitoring for vinyl chloride, lead, dust, tin and noise, a number of other exposures need to be monitored for. They are:

- a. Antimony
- b. Cadmium
- c. Chromium
- d. Titanium Dioxide

Please advise your time table for completing this item and when it has been completed.

Response

COMPLETE 2/12 AND 24, 1993 - RESULTS
SUBMITTED ON PREVIOUS REPORTS, PLEASE
REQUEST RESULTS IF NEEDED.

Status

☒ Complete
☐ In-progress
☐ No Action

IH-1992-6

You need to establish a Cross Check Procedure for analysis of Environmental Monitoring Samples.

Please advise when this procedure has been implemented.

Response

COMPLETED - 1993 - VCM SAMPLES
SENT TO BRECKSVILLE AND HHH LABS (HOUSTON)
FOR CROSS CHECK ANALYSIS. RESULTS HAVE
BEEN SUBMITTED ON PREVIOUS REPORTS, PLEASE
REQUEST RESULTS IF NEEDED.

Status

☒ Complete
☐ In-progress
☐ No Action

deg
12/10/92
auditdp.92f/6

NGC 13241

IH-1992-7 You must develop a Written Program to comply with
IH-204, "Protection of Potable Water Supply" and
implement it.

You have your water sources marked as "Water". The
systems should be marked "Non-Potable Water" or
"Factory Water" in order to minimize the likelihood of
human consumption.

Please advise when the program has been written and
when it has been implemented.

Response

COMPLETE - LINES LABELED - DRINKING
WATER SAMPLES SUBMITTED 7/95 TO
ACE LABORATORIES FOR ANALYSIS - RESULTS
SUBMITTED ON PREVIOUS REPORTS.

Status

✓ Complete
 In-progress
 No Action

IH-1992-8 The ventilation in the Lab Hood has been checked and
the hood is labeled correctly. The Hood however needs
to be detuned to 100 fpm maximum face velocity.

Response

COMPLETE - MAINTENANCE REPLACED SHEAVE.

Status

✓ Complete
 In-progress
 No Action

deg
12/10/92
auditdp.92f/7

NGC 13242