

INTERNAL CORRESPONDENCE

PLAINTIFF'S EXHIBIT

KRC-521



SWRCo
(UNIT)

TO V. W. Litton DATE March 22, 1988
FROM C. DeYong SUBJECT Monthly Activity Report

MAJOR ACCOMPLISHMENTS

Industrial Hygiene

- * Area monitoring for asbestos was completed during removal from the exchangers at #3 Terminal. Thorpe Insulation completed the job in 4 days with 2 days of actual removal and 2 days of building the enclosure and cleanup afterwards.
- * The Tier One form reporting under SARA Title II was completed and submitted to the State and Local Emergency Planning Committee. The form consisted of a one-page summary of hazardous chemicals to be used in planning for emergency situations.
- *** Benzene training is continuing throughout the plant. To date, 190 people have received formal training which consists of a fifteen minute video, a quiz, and a review of slides taken in the refinery.
- *** Hazardous waste training is ongoing in order to meet the recent OSHA standard. Training consists of general topics on noise, hazard communication, fire school and benzene, as well as specific information on hazardous waste and site specific training.
- * Area sampling for Benzene was completed at the API separator and tank 204 since the Sulfolane start up. No results to report at this time.
- * Personal sampling was completed at the API separator area during maintenance activities. Hopefully through engineering controls, benzene concentrations will be reduced.

SAFETY

- * A lead check was performed on Tank S-42.
- * An entry permit was written for work on the solvent regenerator.

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PROBLEMS AND OPPORTUNITIES

- * I had the opportunity to attend a local seminar on the SARA Title III requirements. The seminar consisted of several speakers, a question and answer session, and a display booth area.
- * I was able to talk to a salesman about a direct reading benzene instrument. With the new Benzene standard, it will be important for us to have accurate measurements of benzene levels immediately, instead of having to rely solely on detector tubes.

/fmn

Caroline DeYong