

Interoffice Memorandum

TO (Name and Location) E. L. Tejml	DATE 11-15-79
FROM (Name and Location) G. A. Vos and L. R. Birkner	REFERENCE NO. GAV-109/LRB-287/79

SUBJECT: Industrial Hygiene Review -- Bay City Plant

On November 14 and 15, 1979, L. R. Birkner, G. R. Osborn, G. A. Vos, C. W. Whaley, M. R. Stenzel, G. H. Rodenhausen, C. J. Schaefer, D. G. Bremer, L. Wallace and R. Lehmann participated in an Industrial Hygiene Review of the Bay City Plant. Overall the Industrial Hygiene Program is well organized and administered. It is felt that Bay City Plant employees are adequately protected against chemical and physical agent exposures.

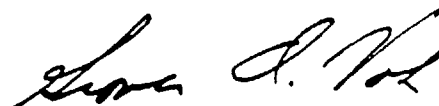
The following action items have been identified to strengthen the overall Industrial Hygiene Program and insure regulatory compliance:

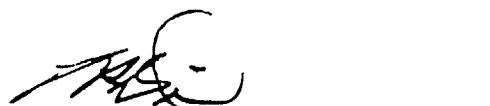
1. To assure adequate documentation of employee notification of interpretative statements on monitoring results, we recommend posting and recordkeeping procedures similar to those currently in existence for the dissemination of toxicity testing results.
2. It is recommended that procedures be established for industrial hygiene responsibility during emergency situations and upset conditions. Such procedures should include documentation of exposed employees and materials involved. Where feasible and appropriate, exposure data should be collected.
3. The following plant policies and procedures should be established:
 - a. Administrative procedures for a plant-wide respiratory protection program conforming to OSHA Regulation 29CFR-1910-134.
 - b. A consolidated hearing conservation/noise control administrative procedure defining responsibilities of Industrial Hygiene, Safety, and Engineering in documenting and implementing the various phases of the plant's program should be developed. It is suggested that all noise measurement and employee exposure evaluation be assigned to the Industrial Hygiene function, that Safety continue to coordinate the collection of audiometric evaluation data and that Engineering be responsible for the noise control.
 - c. An administrative procedure should be written to document the existing radiological health program, specifically source location auditing, recordkeeping, and the procedures currently used to protect employees during weld and corrosion inspections.

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4. An SOP should be written and implemented controlling employee exposure to asbestos during brake and clutch overhauls on motorized equipment.

Please keep the Celanese Chemical Company, Inc. Department of Industrial Hygiene and Toxicology, the Corporate Department of Environmental, Health and Safety Affairs, and the Law Department informed of your progress in these areas.


G. A. Vos


L. R. Birkner

GAV/LRB:as

cc: G. R. Osborn
C. W. Whaley
M. R. Stenzel
G. H. Rodenhausen
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