

Response Recd 8/20/93

HW
RSG
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HENRY PLANT
SAFETY/INDUSTRIAL HYGIENE AUDIT
June 14-17, 1993

309-364
911

I. Previous Audit Items

1990-9 Trailer restraints are an excellent device for preventing accidents when driving a Forklift truck into a trailer. BFG Chemical is in the process of revising SA-131 and require that trailer restraints be provided with all new loading dock installations and convert all existing loading locks by December 1993.

You need to plan to install trailer restraints at each of your docks where forklift trucks drive onto trailers.

Comment: The trailer restraints are on order and will be installed soon.

Plant
Response

Restraints are being installed week of 8/16.

Status

_____ Complete X In Progress _____ Incomplete

5 Comp NH
10 In Prog ITN ITN
0 Incom

NGC 12608

1992-6

A metal box as the female outlet on extension cords is a violation of OSHA Standard 1910.303(a)(2). I have read several citations on this item from other companies. On the next plant quarterly cord inspection, all cords with metal boxes should be replaced with a connection designed for that service.

Comment: Several of these cords were observed during the plant inspection tour. These electrical cords with equipment being used for a purpose for which they were not designed should be removed from service at the next quarterly inspection.

Plant

Response

All areas are turning in cords with "conduit boxes".
Will audit areas during October. Terry Castor working
on alternative box.

Status

_____ Complete X In Progress _____ Incomplete

4.8 Industrial Hygiene Management

The following deficiencies were noted in the industrial hygiene management system:

- (d) If an employee is diagnosed with a standard threshold shift (STS), he/she is retested and an investigation is conducted to determine if the STS is work related or not. In many cases, although an investigation is not required, one was not completed in a timely manner and the documentation appeared to be disorganized and incomplete (GMP).

Comment: STS are still being left without closure. The plant procedure which was stated in the 10-26-92 response has not been prepared.

Plant
Response

Recorded two on 1992 log. No employee with a STS exist now. Area surveys are being done. Procedure for handling has been written.

Status

X Complete In Progress Incomplete

4.9 Industrial Safety

The following deficiencies were noted in the industrial safety management system:

- (a) During the site inspection, it was observed that a number of exit signs were either not illuminated or properly located. It was noted that the facility conducted a survey of the exits, and sixty percent of the deficiencies identified by

the facility have already been corrected
[29CFR1910.37(q)(6)].

Comment: Illumination of exit signs is still an issue and needs to be resolved. Also during the plant inspection tour, several exit signs were noted with the light not working (Resin Reclaim area and B/732 silo area)

**Plant
Response**

Replaced lightbulbs. PM generated to keep bulbs re-
placed. "Glo-Mor" signs used at the facility on doors
that do not have emergency lights are of phosphorescent
material that will glow in the dark for up to 8 hours.

Status

 X Complete In Progress Incomplete

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II. Items To Be Corrected

1993-1 OSHA issued a new standard 1910.146 Permit Required Confined Spaces on January 4, 1993 with an effective date of April 15, 1993. The GEON company SA-106 Confined Space Entry Safety Standard and SA-112 Confined Space Rescue has also been issued. You need to revise the Henry Plant Safety procedure SA-9E and proceed to comply with each of the requirements.

The following are areas that need to be addressed:

- The LEL and Oxygen detectors need to be calibrated on a regular basis. Both were found not working during the plant inspection tour.
- Provide continuous LEL monitoring during entry.
- Upgrade the confined space rescue team to meet the requirements of OSHA and The GEON Company.
- Conduct annual rescue drills with each member of the rescue team.
- Provide an attendant for the duration of the entry. The attendant maybe stationed at any location outside the confined space and perform other duties as long as he can effectively monitor the space and perform the required attendant duties.
- Revise the entry permit forms.
- Review each completed permit for compliance and retain for at least 1 year or 30 years if exposure monitoring is performed.

Plant
Response

All above items are being addressed - expected completion December.

Status

_____ Complete X In Progress _____ Incomplete

1993-2

During the plant inspection tour, three of the attachments on the hold down bolts on the incoming VCM filter were found loose and not secured in place. This condition should never be allowed.

**Plant
Response**

Replaced bolts - covered topic in Safety Meeting.

Status

 X Complete In Progress Incomplete

1993-3

Standing water on the floor was observed at the Resin reclaim press, in the ultra filtration building and in 3 locations in the warehouses. Steps need to be taken to maintain, so far as possible, a dry condition. In wet processes, drainage shall be maintained, and false floors, platforms or mats should be provided.

**Plant
Response**

Reviewed topic with personnel. Purchased warning signs for intermittent leaks. Repaired warehouse roof leaks. Working on solution for resin reclaim and UF Building.

Status

 Complete X In Progress Incomplete

1993-4

In reviewing the Compound Department's mill drill documentation, only 2 were found for 1993. Also weekly check of stopping distance could not found.

GEON Company Standard SA-113 requires that mill drills be conducted once per month by each shift and a check on stopping distance be conducted weekly on each mill. You need to comply with these requirements.

Plant

Response

Reviewed with Leadermen. Records being kept.

Status

X Complete In Progress Incomplete

1993-5

The plant respiratory program needs improvement. Several respirators were observed in the plant hung on coat hooks and several were in need of repair. The records on monthly inspections showed that several of the required monthly inspections had not been conducted.

Proper storage needs to be provided and monthly inspections must be conducted. Respirators in need of repairs should be taken out of service.

Plant

Response

Inspection made. Respirators assigned. Training to be conducted in October. New storage bags ordered.

Status

 Complete X In Progress Incomplete

1993-6

In 1992, 30% of the recordable injuries in The GEON Company involved second degree burns or cuts requiring sutures of the arm, wrist or hand. The Henry plant should consider requiring Kevlar sleeves to be worn while working near the mill to reduce the potential of this type of injury. Refer to the Avon Lake narrative on the 2/6/93 recordable injury.

**Plant
Response**

Waiting on information on supplier of sleeves.

Status

_____ Complete X In Progress _____ Incomplete

1993-7

We observed the Blending Resin bagging operation during the plant inspection tour. The bags presently being used leak resin and requires the bagger to dust off the bags and cause a housekeeping problem in the area. The bags do not stack on the pallet evenly and the stability of the full pallet is questionable. Also the Cancer Warning stamped on the bag is poorly printed.

Corrective action needs to be taken with each of these items.

**Plant
Response**

Addressed items. Southern Bag visited plant and are addressing leaking problem. New bags also ordered. Some bags now have label instead of stamp. Refurbished stamp until all bags have manufactured labels.

Status

_____ Complete X In Progress _____ Incomplete

1993-8

A recent decision within The GEON Company has been made that PVC Resin will be labeled with the Cancer Warning statement contained in OSHA Standard 1910.1017(1)(4). You need to label the plant PVC Resin containers such as silos, blowdown tanks, reactor etc. On July 1, 1993 you are to place tags containing the Cancer Warning statement on Railroad hopper cars, bulk trucks and air pallets of PVC Resin shipped to domestic customers. The resin bags will contain this statement when newly printed GEON Company bags are put into the system.

You also need to install this warning on in-plant VCM containers such as VCM spheres and recovery tanks.

In conjunction with this, you need to monitor your employees in compound operations for exposure to Vinyl Chloride.

**Plant
Response**

Bags, skid, silos done. Still need to do Rx, sphere's, recycle.

Status

_____ Complete X In Progress _____ Incomplete

1993-9

In reviewing the PVC Polymerization operating procedures, I noted several that were dated 1984, 1987 etc. I also noted a 1990 Tech Memo which was still in effect. OSHA Standard 1910.119 Process Safety Management of Highly Hazardous Chemicals require that operating procedures be certified annually that they are current and accurate. A plant management system needs to be provided to meet this requirement.

**Plant
Response**

WPS system being installed - estimated completion April 1994.

Status

 Complete X In Progress Incomplete

1993-10

With several of the major fires and explosions in chemical plants and refineries, the importance of a safe exit from the workplace is brought out. All of your exits need to be properly identified and illumination provided as required by OSHA Standard 1910.37(q)(6). Each of your fenceline gates need to be marked as an exit, emergency exit, not an exit or be identified with its actual character (function). The fenceline emergency exits need to be unimpeded and be identified in your plant evacuation procedure.

The stairway fire doors in the Compounding Building are held open with a fusible fire link. These need to be activated by smoke instead of fire, to meet standards.

**Plant
Response**

All above items addressed. New ventilation blower
ordered for Compounding. Reviewed with operators need
to eliminate fusible link and keep fire doors closed.
Emergency Action Plan altered to address fenceline
gates.

Status

 X Complete In Progress Incomplete

1993-11 Repetitive motion recordable illnesses are beginning to occur to people who work for long periods at VDT work stations. Within the past two years The GEON Company has experienced three (3) cases.

It is recommended that the Henry plant review the VDT work stations for proper ergonomic design. Work stations which are used by an individual four or more hours a day should be modified to fit the individual properly. Your new workers' compensation carrier, Liberty Mutual, will review each of your stations and make recommendations. You need to pursue this with Liberty Mutual.

Plant
Response

Contacted Liberty Mutual - will expect audit last
quarter 1993.

Status

_____ Complete X In Progress _____ Incomplete

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