

1994-97 OCCUPATIONAL HEALTH PROGRAM
CHLORINATED ETHANES, A-2400 AND CHLORINATED METHANES, A-1800

INDUSTRIAL HYGIENE EDUCATION PROGRAM

1. INTRODUCTION

Training will be documented using the forms located in the "Hazard Communication" section of the facility's Industrial Hygiene Manual. The original documentation will be sent to Industrial Hygiene Services at B-101 for filing in the plant compliance files.

2. TRAINING PLANS - CHEMICALS

The Industrial Hygiene Education Program will focus on the following key agents for 1994-95:

1994

CEP:

Vinyl Chloride
Lead
Welding Fumes
Hexachlorobenzene
Butylene Oxide

CMP:

Methanol
Phosgene
Methylene Chloride
Lead
Welding Fumes

1995

A combined health hazards training will be arranged as was done in 1993. The following will be covered as a minimum: Chlorinated Organics, Acids and Alkalis, and Freon.

3. RESPIRATORY PROTECTION TRAINING

CEP/CMP will follow the guidelines defined in the Plant's written respirator program (located in the Industrial Hygiene Manual). Annual training is required.

4. CHEMICAL SURVEY RESULTS

A report of the results of sampling conducted in accordance with this protocol will be written and communicated individually and in a group session.

5. HAZARD COMMUNICATION TRAINING

All new employees shall review and document with signatures:

- a. hazard communication videos (2)
- b. the facility's hazard communication program
- c. health hazard information for all materials with Priority Rating of 1, 2, or 3 (see CPAI)
- d. health hazard information for OSHA regulated chemicals with Priority Rating of 1, 2, 3, or 4
- e. health hazard information for the key agents listed above.

See the Plant's written Hazard Communication program in the Hazard Communication section of the facility's Industrial Hygiene Manual for other training requirements.

Any temporary employees shall review and document: b,c,d,e.

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6. ASBESTOS TRAINING

All personnel who work in CEP/CMP must receive initial training. Refresher Asbestos Awareness Training will be conducted every 2 years. Consult the Texas Operations Asbestos Handbook for training requirements.

7. NOISE TRAINING

Noise training for CEP/CMP is required every two years. Refer to the Hearing Conservation Manual for training requirements.

8. NEW CHEMICAL TRAINING

Per HAZCOM all employees to be potentially exposed to a new chemical must be trained on the hazards of that chemical and the approved protective equipment. Signed documentation is required at the time of this training, to include MSDS, TIME sheet, or hazard data used.

9. HEAT STRESS TRAINING

Personnel performing jobs (eg. chemical suit in the summer) that may lead to heat stress are to be trained on heat stress avoidance procedures. This training is recommended for new employees and on a periodic basis for experienced employees. Training should be documented.

10. PROTECTIVE EQUIPMENT TRAINING

Per 29 CFR 1910.132 protective equipment shall be provided, used and maintained for employees with potential of exposure to environmental or process hazards. Personnel are to be trained on the proper use or applicable protective equipment upon initial assignment, after major job changes, and periodically. Consult the Texas Operations Personal Protective Equipment Program Manual for training guidelines.

12. VENTILATION SYSTEM TRAINING

Personnel that use ventilation systems (incl. hoods, dust and chemical ventilators) are to be trained in the use, maintenance and documentation requirements. Consult the Texas Operations Ventilation Manual for training guidelines.

13. HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE

Per HAZWOPER personnel involved in operations in RCRA Treatment, Storage, and Disposal facilities must be trained. Training must enable the employees to perform their job in a safe and healthful manner so as not to endanger themselves or others. Training topics include respiratory protection, hazard communication, health hazards training, protective equipment, safety standards/references, job procedures, RCRA, hearing conservation, eye protection, emergency procedures and unit specific rules.

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1994-97 OCCUPATIONAL HEALTH PROGRAM
CHLORINATED ETHANES, A-2400 AND CHLORINATED METHANES, A-1800**OSHA SPECIAL REGULATIONS**

The Chlorinated Ethanes/Chlorinated Methanes Plant (CEP) is directly affected by OSHA special regulations 29 CFR 1910.1001: Asbestos, 29 CFR 1910.1028: Vinyl Chloride (CEP only), and 20 CFR 1910.95: Occupational Noise Exposure. A copy of each of these standards is located in the plant's Industrial Hygiene Manual. Key elements of the standards includes:

A. Asbestos and Vinyl Chloride

1. exposure monitoring requirements
2. respiratory protection and personal protective equipment
3. medical surveillance
4. information and training

A review of the past monitoring data, the plant's respiratory protection and protective equipment policies, and Hazard Communication and training program, has confirmed CEP/CMP to be in compliance with the requirements outlined in the Asbestos and Vinyl Chloride standard.

B. Noise

1. exposure monitoring requirements
2. audiometric testing requirements
3. hearing protection requirements
4. training requirements

A review of the hearing conservation program at CEP/CMP has confirmed the plant to be in compliance with the requirements outlined in the Noise standard.

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