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Interoffice Communication

To Dr. R. L. Lembke
From C. L. Miller
Date December 18, 1979
Subject ANNUAL INDUSTRIAL HYGIENE INSPECTION
ABERDEEN PVC PLANT

We have reviewed Dr. Steffy's report and have made improvements to the plant as a result of it. We appreciate the effort and detail that was put into the inspection.

While Dr. Steffy obviously reported what he saw and our overall housekeeping was not up to par on the days he visited the plant, I would like to avoid concluding that housekeeping has declined over the past year. Just the opposite conclusion has been reached by several other groups that have toured the plant during the past two years and favorable remarks have been received from OSHA industrial hygienists and EPA inspectors.

The primary reason for substandard conditions during the inspection was an operating problem in our dryer slurry feed system caused by a screen failure in the reactor area. Considerable manpower was devoted to correcting this problem resulting in use of several hoses and detracting from normal housekeeping duties.

Specific replies to Dr. Steffy's recommendations are as follows:

Central Control Room

The oven and refrigerator are cleaned and defrosted by the contract janitorial service. We have tightened up the cleaning schedule and spot inspections by the Operations Supervisor will be made.

West Reactor Area

The four drums mentioned contained calcium stearate and these drums are labeled on the removable tops and on the sides. The tops were removed. We will make a special and continuing effort to be sure all drums are properly labeled.

New Reactor Area

All fresh air outlets will be equipped with standardized fittings and weather protecting caps. Care of respiratory equipment will be covered in future safety meetings and will include keeping hoses rolled up when not in use.

The hoist beam located on the east end of the reactor structure has now been labeled as to load capacity.

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Pond Area

We recently completed sandblasting and painting of this infrequently visited area. Much of the debris noted in the inspection was a result of inadequate inspection after the contractor completed the job. This area has been cleaned up now and will be inspected by the utility technician on a frequent basis and his supervisor on a less frequent basis.

Chilled Water Building

This out of service equipment does not receive routine attention and plans are to dismantle it in 1980. In the meantime, this area has been cleaned up and spot checks and cleanups will be done as required.

Dryer Building

This area was not up to standard during the inspection partly due to a severe operating problem with the slurry feed system necessitating more hose use than normal and less operator attention to the sifter area. The sifter area requires frequent cleaning and a vacuum system will be considered for the 1981 budget. Fresh air lines have been rolled up and will be capped when materials arrive. The roof hoist has been labeled for load capacity. We have continuing requirements for roof maintenance in several areas and are pursuing this on a priority basis.

Plasticizer Building

The glass graduated cylinder in the lab has been replaced, the lab bench has been cleaned and revisions are planned to correct the temporary electrical hookup for lighting the new plasticizer filter.

Emergency Safety Equipment Station

The metal grid drain cover has been straightened and the compressed gas cylinders have been tied down or removed from the building.

Old Dryer Building

The drain cover has been replaced. The floors require cleanup once per shift. Insulation will be replaced as priorities permit. A plant wide study is scheduled for safety shower and eye wash installations as several are below the minimum standard.

Old Reactor Storage Building

Filter cartridges and miscellaneous materials stored in this building are being reorganized.

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Shops

Due to the heavy workload associated with dryer slurry feed line plugging on the days of the inspection, the maintenance shop was not cleaned up. This shop is normally cleaned on a daily basis and spot checks since that time have not found housekeeping problems.

The unsecured gas cylinder has been removed from the welding shop.

Storeroom

APE parts and materials have been moved from the storeroom to provide additional space and additional shelving is on order to provide decreased congestion.

Main Offices

The lunchroom oven has been cleaned and a routine cleaning frequency has been established.

Once again, we do appreciate the constructive remarks in this inspection report and the Medical Department contribution to our overall effort.

Curry L Miller

Curry L. Miller

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c: ODS, RWG, JDB, JJH, AHS, CRM, SJV, CRM