

TO R.C. Lockemer/J.W. Gressler	FIELD POINT OR DEPT. & BLDG. NO. Avon Lake	DATE YOUR LETTER
FROM T.S. Bialke	FIELD POINT OR DEPT. & BLDG. NO. Akron - D/0020, 5-H	DATE THIS LETTER 9-16-81
SUBJECT		

ALGC OSHA Progress Report

Your July 1981 OSHA progress report was reviewed with considerable interest. I am pleased that ALGC has begun to issue such a report. I offer the following comments and suggestions which I hope will improve its usefulness.

1. It would be beneficial to briefly discuss the plant's personnel monitoring results to explain anomalies in the table. What stands out in the table is that B/461 is out of compliance - why? What is the cause of the overexposure? What is being done to eliminate such exposures? Are the workers being protected by respirators?
2. I would like to see your noise dosimeter results reported as percent of allowable dose and not as dBA. Also, please note in the report what threshold the noise dosimeters are set at. All noise dosimeter work is to be done with the instrument set at the 80 threshold.
3. The acrylonitrile OSHA TWA is 2 ppm; the action level is 1 ppm.
4. The MDI work your lab is doing in conjunction with the Technical Center is needed. Is the work that is being done at Avon Lake being coordinated with Paul Zakriski at Brecksville?

I look forward to visiting the ALGC plant the week of September 28 for my scheduled industrial hygiene survey. Hope to see you then.

T.S. Bialke
T. S. Bialke

V

cc: E.B. Katzenmeyer, Jr./H.W. Dietz
H. Waltemate
W.C. Holbrook

26140001

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J. W. Gressler ALGC - Health, Safety & Enviro. Affairs
R. C. Lockemer ALGC - Environmental Affairs

9-9-81

OSHA Progress Report - July, 1981

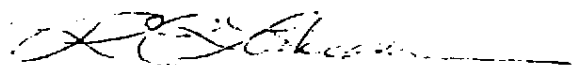
what is going on in 6461

1. The results of personnel and area monitoring conducted during the month are presented in the attached tables. *BACCH, Discus. If OSHA, OSHA ATTACHMENT, etc - Ex. Summary Type.*
2. Met with Compound West during their regularly scheduled safety meetings to discuss industrial health issues. Two areas of concern surfaced: maintenance of the ventilation system and the need for cotton pants for baggers and dumpers. These issues are being addressed and a response will be issued in August.
3. A weighman in B/438 received an extremely high exposure to lead dust ($>1,000 \mu\text{g}/\text{m}^3$). The result is particularly confusing since Compound West has taken several steps to reduce exposure. We are working with the Brecksville Laboratory to verify the accuracy of the reading.

Lead levels in blood samples taken from Compound West employees remain low, which indicates that long term lead exposure is not a serious problem. Regardless, we will continue to identify and eliminate sources of lead exposure above the OSHA allowable.

4. Our and the Tech Center's lab are zeroing in on the problem with MDI analysis. They are developing a revised analytical technique.

what is it?


Robert C. Lockemer

RCL/bp

Distribution:

B. R. Welch
W. E. Horton
C. Bayard
J. R. Shellenberger
D. D. Quester
J. C. Meck
E. C. Gilbert

D. J. McDonald
D. J. Barnicki
K. J. Kaminski
T. S. Bialke
H. Waltemate
J. A. Kiel-Ped.
D. J. Gargas

26140002

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~~R. A. KETTER~~
J. W. Gressler

R. C. Lockemer

ALGC

ALGC - Environmental

3-8-82

OSHA Progress Report - January, 1982

1. The results of personnel and area monitoring conducted during the month are presented in the attached tables and figures.
2. A Special Notice on the new 85 dBA noise standard was issued. All affected departments have been issued signs to be posted around areas where hearing protection is required. These signs will be installed by February 1, 1982.

We have been working with A. Zoltai on the impact of the new program on outside contractors. New bid packages will require contractors to provide and enforce the use of hearing protection in accordance with BFG standards. Existing contracts are a bit more complicated since they do not include a noise protection clause. For now, BFG will provide hearing protection if requested by the contractor and will require that hearing protection be used.

The entire issue of contractor compliance with BFG and OSHA standards has been raised with Akron Environmental Health. Apparently, there is no formal company policy. Akron is looking into providing some general guidance for the future.

Finally, we began a series of meetings with B/433 operators at the Department's request to discuss the new noise program.

3. Area VCM levels in B/464 increased significantly in January. These increases were primarily due to leaks from equipment which suffered ice damage during the Christmas Holiday shutdown and the subsequent cold snap. Equipment is being repaired or replaced as quickly as possible.

RCL/bp
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J. Ritz
S. Bialke
H. Waltemate
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D. J. Gargas

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SUMMARY OF
PERSONNEL MONITORING

January, 198 2

Parameter	Allowable Conc. 8 hr. TWA	Month			Year-To-Date		
		No. of Samples	Avg. Conc.	No. Above Allowable	No. of Samples	Avg. Conc.	No. Above Allowable
VCM*	1 ppm						
Plant		36	1.40	12	36	1.40	12
B/432							
B/438							
B/449							
B/451							
B/452		1	.22		1	.22	
B/454							
B/455		4	.18		4	.18	
B/457		4	.55	1	4	.55	1
B/458		3	.20		3	.20	
B/459							
B/461		15	2.10	6	15	2.10	6
B/463							
B/464		7	2.09	5	7	2.09	5
B/466		2	.33		2	.33	
B/468							
B/471							

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• Includes all long term monitoring with and without tasks.

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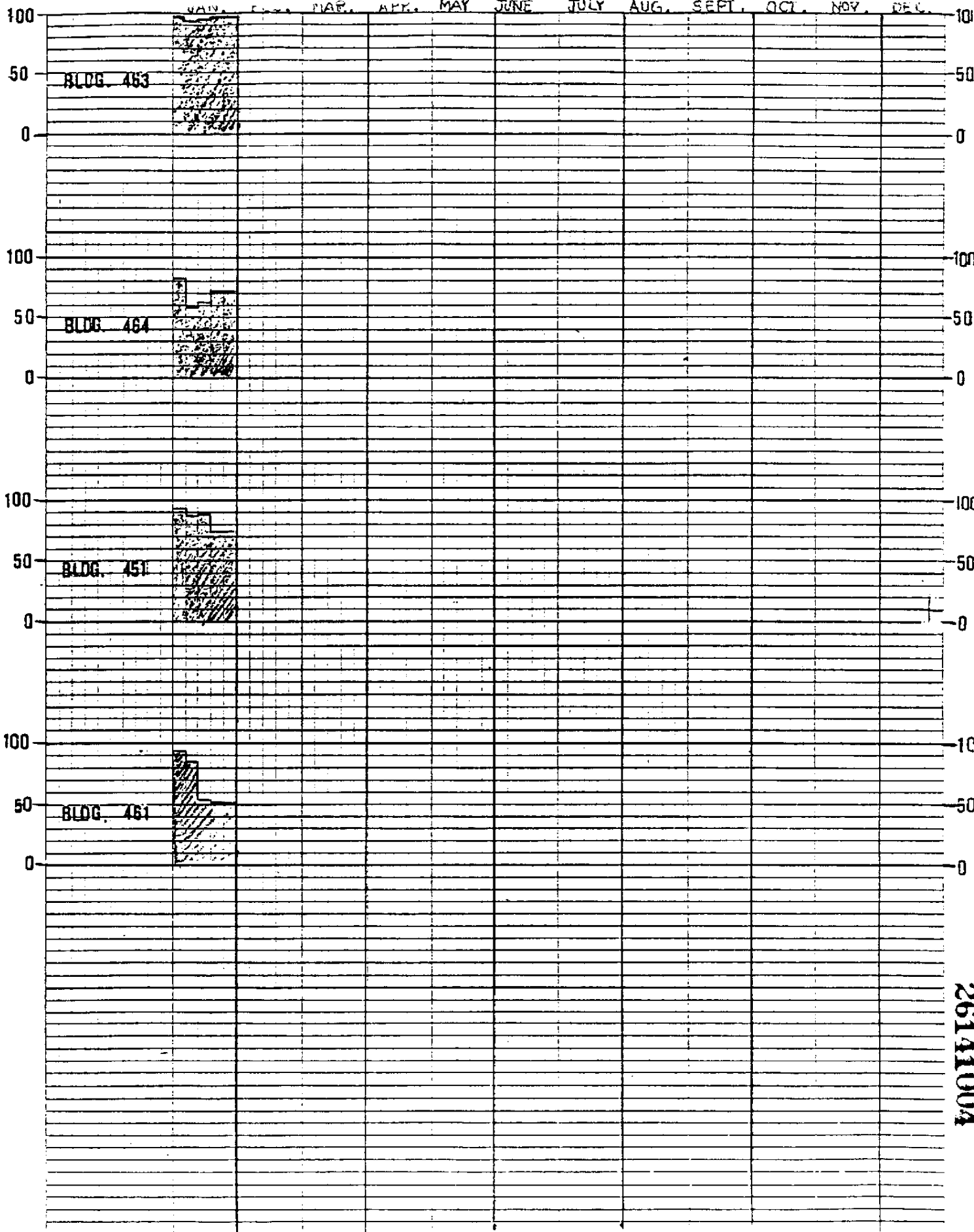
SUMMARY OF
PERSONNEL MONITORING

January , 1982

Parameter	Allowable Conc. 8 hr. TWA	Month			Year-To-Date		
		No. of Samples	Avg. Conc.	No. Above Allowable	No. of Samples	Avg. Conc.	No. Above Allowable
Dust							
Total	10 mg/m ³						
Respirable	5 mg/m ³						
Noise	85 dBA	24	85.2 dBA	8	24	85.2 dBA	8
metals							
Sb	500 µg/m ³						
Cd	200 µg/m ³						
Cr	500 µg/m ³						
Pb	50 µg/m ³						
Other							

Area Personnel Monitoring	VC1 % Actual < 1			
	Month		Year-to-Date	
	(No.)	%	(No.)	%
B/451				
B/461	15	60%	15	60%
B/463				
B/464	7	29%	7	29%

26141003



TO P. Zakriski Brecksville
DM T.S. Bialke Akron - D/0020, 5-H
SUBJECT VCM Breakthru at ALGC

I visited the Avon Lake General Chemical plant on Tuesday, June 8 to discuss their VCM breakthru problem with B. Lockemer, B. Welch and C. Yokey. We were unable to draw any definitive conclusions as to why the breakthru frequency has increased. The plant is going to change its method of connecting the two PMCC tubes in tandem. They are using a device that uses "O" rings to provide a tight seal. I suggested they make connections directly to sample tubing. They agreed to try it for a few weeks.

Also, they agreed to flash conditioned PMCC tubes to ensure that only "clean" VCM-free tubes are used for sampling. I recommended they try this for two weeks to see if the change in connecting tandem tubes and using certified "clean" tubes would reduce breakthru.

As we discussed at the last laboratory/environmental health department meeting, I obtained some Avon Lake G.C. plant's flasher tubes for you to analyze to see what residuals may be left on PMCC tubes between uses. The ones marked "old" (white tape) are tubes the plant no longer uses. The ones marked "dirty" (red tape) are tubes they are now using. The tubes have been flashed, but not purged or cleaned. The tubes marked "clean" (white tape) have been purged and are ready to use. The purge consisted of two, one hour purges at 325°F.

T. S. Bialke
T. S. Bialke

V

cc: ~~E.B. Katzenmeyer, Jr./H.W. Dietz~~
B. Lockemer/B. Welch/C. Yokey
H. Waltemate/E. Martinelli

26142001

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