

Interoffice Memorandum

TO (Name and Location)

*As listed

FROM (Name and Location)

Bruce T. Bowyer - NYO

RECEIVED
FEB 27 1984
GAR

DATE

February 27, 1984

REFERENCE NO.

BTB-17-84

Subject: Corporate Industrial Hygiene Audit
of the Bishop CER Facility,
December 5-6, 1983 - Final Report

ESC

An industrial hygiene audit of the Bishop CER facility was conducted on December 5 and 6, 1983 with the following participating in the audit team:

Bruce Bowyer - NYO
Wendell Brough - Bishop
Gary Ille - Bishop
Vince Parrillo - Chatham
Joseph Stelluto - NYO
Mark Stenzel - Dallas
Don Unruh - Louisville

Although the audit was a comprehensive review of the facility industrial hygiene program, the audit report is an exception report which addresses only those areas requiring attention. Those elements of the industrial hygiene program not mentioned were found to be acceptable. The findings which require further action are as follows:

1. Some aspects of the Respirator Program are inadequate and need to be reinforced as evidenced by the following:
 - a. Improper storage of respirators in the Celcon bagging area.
 - b. Lack of use and improper use in the Celcon and pigment areas and during ETOX unloading.
 - c. Although quantitative fit testing was attempted, because of technical problems with the fit testing apparatus, fit testing is not being done on all employees required to wear negative pressure respirators.
2. A facility Industrial Hygiene QC program to assure uniform application of validated sampling and analytical procedures and methods is not being provided.

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3. Functional guidance for industrial hygiene sampling and analysis to assure integrity of data is not being provided in all cases by the Industrial Hygiene professional.
4. There is insufficient sampling data to determine compliance with the Celanese internal limit for formaldehyde in the Special Products area. Area sampling conducted by NATLSCO suggests a potential exposure problem in this area.
5. The sampling and analytical method being used for Ethylene Oxide is not validated at exposure levels equivalent to the COEL.
6. Although short term samples do not indicate an exposure problem, more 8-hour TWA exposure data is needed in the Special Products Area to determine compliance with the COEL for Antimony Trioxide and with the Federal ETS for Asbestos.
7. More toxicity and exposure data is needed to assess the hazard potential in the pigment areas.
8. Not all chemicals are cleared for purchase by SHE department as required by Bishop plant policy.
9. Industrial Hygiene walkthrough surveys by the Industrial Hygiene professional are not conducted on a regular and frequent basis to aid in recognition and hazard evaluation of current and changing operations.
10. Raw exposure data is, in some cases, being released to plant management and supervision prior to review and interpretation by the facility Industrial Hygienist.
11. Although the facility industrial hygienist issues an annual sampling schedule outlining the requirements for each quarter, a formal sampling philosophy based on the statistical need for monitoring in an area has not been developed.
12. Routine maintenance, inspections and air flow measurements of local exhaust ventilation systems are not being conducted on a routine basis.

Within four weeks of the date of this report, the Bishop CER plant is requested to submit to the corporate audit team its corrective action plan for each of the above findings, with the name of the responsible person and a completion date for each proposed action. Any findings which have already been corrected should be identified in the action plan. The corporate audit team will promptly notify the facility of any difficulties or problems it sees in the proposed corrective action plan. The status of each action item will thereafter be reported in quarterly follow-up reports filed by the facility with the corporate audit team until all action items have been completed.


B.T. Bowyer

BTB:sl

*R.G. Brandt - Bishop
W.H. Brough - Bishop
W.H. Meyer - Bishop
B.R. Miller - Chatham
D.H. Miller - Chatham
D.G. Ogilvie - NYO
G.A. Rodenhausen - NYO
K.J. Weiner - Chatham