

To: Mr. J.A. Bielaus Unit: ICD, Manufacturing
From: D.W. Hurley Unit: ICD, Manufacturing
Subject: CLOSING - OSHA CONFERENCE - PHILADELPHIA PLANT
July 6, 1977

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JEFFREY E SILVER

Eileen Crenshaw of the Occupational Safety and Health Administration visited the Philadelphia Plant on July 6th to hold a closing conference which marked the end of the OSHA Survey begun on May 19th and carried through May 25th and July 1st (3 days). Present at the closing conference were: P. Warensky, T. Anderson, and myself.

After receiving a list of items to be discussed, Tom and I contacted Jeff Silver and Jeff Jacobs for advice on how to answer the questions posed.

We were very concerned with the questionnaire that Miss Crenshaw distributed on July 1st to the plant hourly personnel and requested copies of same. Miss Crenshaw assured us that we would receive copies with the names deleted upon written request to the Area Director. This was a definite commitment on her part.

We then proceeded to discuss the areas that she wished to review before making our closing comments. These I will list with pertinent comments.

- 1 - Record review OSHA Form 100, 101, and 102. Miss Crenshaw found one name missing on the 1977 OSHA 102 form. This was an oversight in record keeping and will be so noted on a forthcoming citation. Otherwise records were satisfactory.
- 2 - Personal Monitory. We agreed to discuss the personal monitoring data that had been supplied to OSHA over the past year. Miss Crenshaw wanted the raw data and requested a review of all the sampling we have done in the plant. We declined, indicating that we preferred to remain in the areas relevant to the OSHA citation. She indicated that the data we supplied did not show substantial improvement and was not definitive enough.
- 3 - Air Helmet Information. She asked why we were testing the particular air helmet which is a British-made unit not yet approved by NIOSH. She indicated that Three M and MSA did have approved units and further mentioned that we could be cited for using an improper respirator; but because of lack of evidence, she would not follow through on the citation.

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- 4 - Miss Crenshaw requested blood lead and medical data. We declined to give any information in this area and noted that this had been stated to OSHA in writing.
- 5 - Why were Vitamin B-12 shots being given by the plant medical unit? We spoke with Dr. Alberico; he indicated that only in two instances B-12 shots had been given to individuals in the plant and they were not at all related to treatment for lead.
- 6 - Flow Process Diagrams. Miss Crenshaw had made rough diagrams of the plant equipment and tankage and asked if the materials flow through the systems was correct. We reviewed the diagrams and corrected any items that were in error. She was informed that even though these were rough diagrams, the information was proprietary.
- 7 - Weekly Overtime List. We declined to give any information in this area.
- 8 - Minutes of Safety and Health Meetings. We declined to give any information in this area.
- 9 - Written Programs Training and Hygiene. We advised that we would supply by mail copies of the respirator program and any other relevant program related to health and training that would have a bearing on our plant efforts to upgrade attention to lead in air.
- 10 - Engineering Controls. We discussed in detail the engineering controls that have been added since 1975 to help in abating citations. We discussed specifically Buildings #42, #18, and #2.

Closing Comments

Miss Crenshaw then proceeded to give us the closing comments which would be presented to the Area Director in her report.

- 1 - Progress had been made at this facility since 1975 with respect to engineering controls.
- 2 - Personal Protection Program appears to be "fairly good". She recommends here more enforcement with respect to penalties above and beyond verbal and written warnings; and more attention to housekeeping. She felt the gloves were not changed frequently enough.
- 3 - Training. She suggested more programs in regard to respirators and handling of lead. Also the need for more definitive programs for the hourly people and refreshers for salaried people.

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- 4 - Air Monitoring. She felt that the data she had seen shows no significant trend. She termed the data as being sketchy and would like to see more definitive work.
- 5 - Medical Program. She said that OSHA definitely would need a medical protocol from the plant if they are to consider the petition for modification of abatement (PMA).

Specific Recommendations to Area Director

- 1 - The company does need time to affect engineering improvements.
- 2 - OSHA should strive to obtain medical data from the plant to insure that employees will be treated properly over the period that engineering is taking place. Miss Crenshaw indicated that she would recommend that the PMA be denied if the medical data is not forthcoming. She indicated that the attorney for the Philadelphia area is Ms. Reggir Kossak if our attorneys wish to contact her.

New Violations That Will Be Cited In A Citation

- 1 - Section 1910:22A2. Floor in Building 26 wet. I noted that we have arranged for the repair and while we were discussing this Tom Anderson confirmed that the area had been examined and some repairs made. However, extensive drainage repairs may be necessary. We estimated 6 months for this project.
- 2 - Section 1910:151C. Emergency shower in 6 Building was not working at the time of the inspection. That was corrected on the spot.
- 3 - Record keeping because one individual had not been listed on the OSHA form 102 for 1977.
- 4 - Because of lack of evidence, we were not cited for improper respirators and lack of respirator programs for supervisors.

As a follow-up, Tom Anderson will send a letter to Miss Crenshaw asking for the questionnaires and further transmitting to her copies of the plant respirator program and other training and hygiene related programs that may be applicable. Before transmission to OSHA they will be sent to Hightstown to my office for review by the parties concerned.

DWH/dmc

cc: Messrs. T. Anderson, W.E. Blair, J. Jacobs, J.H. Paraskevas,
J. Silver, J. Roper, J.M. Stark, P. Warensky

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