PLAINTIFF'S EXHIBIT

TEX-127

JRS

Texaco

SAFETY & INDUSTRIAL HYGIENE
DEC 19 1984

JRS	✓	✓	PAG		
OWR	12/19				
OBR			JWW	✓	
DLMcK			JTH	✓	1/9
JHB			RDC	✓	
KHT					
GAM	✓	✓	FILE		
JDW	✓	✓	LIBRARY		
KH			DESTROY		

SAF Safety + IH
Texaco USA
Bakersfield Plant

DATE: December 13, 1984

TO: Mr. L. E. Perrier
Bakersfield, CA

FROM: Mr. Robert A. Cox
Houston, TX

SUBJECT: SAF-INDUSTRIAL HYGIENE
BAKERSFIELD PLANT
PROGRAM EVALUATION

Please refer to our May 29, 1984 memorandum to Refinery Plant Managers, and the attached recommendations which concern the industrial hygiene program evaluation conducted at Bakersfield Plant November 26-29, 1984. The review was conducted by Mr. D. J. Slack, Texaco USA-Manufacturing and Mr. J. D. Watts RESD-Safety and Industrial Hygiene Group.

We appreciate the assistance of your staff, especially Messrs. G. H. Turl and B. D. Freeman in preparing for this effort and providing valuable input for improvement needs. We would also like to acknowledge the assistance provided by RESD in performing these reviews.

Improvement needs are provided below for your consideration. These needs have been listed in order of priority.

- Develop industrial hygiene aspects of the health and safety program by increasing the frequency and type of monitoring of employe exposure to chemical and physical hazards. (See Attachment II)

- Revise the hearing conservation program so that it is consistent with regulatory requirements and the Company guideline.

- Develop and implement a program to control contractor safety performance (refer to Mr. R. H. Howell's October 1, 1984 memorandum concerning this subject). The input of health and safety into the various processes of selection, evaluation, and control of contractors is critical to the success of this effort.

- Revise practices concerning use of respiratory protection, including a means to control exposure of personnel welding in small confined spaces, spot checking bottled breathing air quality, and additional safeguards for control of respirator selection. To avoid inadvertent connection of breathing air equipment to harmful utilities, insure that utility fittings

are incompatible and, whenever possible, that all nitrogen lines are hard piped and do not have fittings which can be readily changed or modified.

- Provide training to those responsible for recording and reporting information required by the Toxic Substances Control Act (TSCA).

- Verify that the present program for medical surveillance is consistent with the program prescribed by Mr. R. H. Howell's October 1, 1984 memorandum.

- Implement a program to periodically evaluate the function of fixed hydrogen sulfide monitors.

- Implement a program to periodically evaluate laboratory ventilation hoods.

Specific recommendations concerning these program needs are provided in the attached computer printouts and were discussed during the survey. These recommendations will be included in the quarterly follow-up of industrial hygiene recommendations.

To implement these recommendations and improve the efficiency of the EH&S staff, access of the staff to a personal computer (IBM compatible) would be beneficial. In the near future we intend to survey applications, and will provide those that have been found to be useful.

Program improvement needs for this office were also identified during the survey.

- Develop an industrial hygiene sampling protocol and provide assistance to perform initial sampling.

- Coordinate those changes with Legal which concern contractor safety provisions of BKP and LAP contracts.

- Provide additional guidance and tools to assist refineries in the implementation of contractor safety programs.

- Forward certain health and safety information and provide additional orientation and assistance.

These needs will be prioritized upon completion of all plant surveys, and objectives will be established to satisfy these needs.

Robert A Cox

DJS:pb
12/11:6

Attachments

RHH
JRS
CVB

ATTACHMENT II

1985 INDUSTRIAL HYGIENE SAMPLING PROTOCOL FOR BKP

	BENZENE/TOHC	SO_2	H_2S	NI CATALYST
CRUDE & VACUUM DISTILLATION	4			
GAS OIL DESULFURIZER	4			
HDS/REFORMER	4			4
FRACTIONATING	2			
SULFUR RECOVERY	2	2	2	
STORAGE/BLENDING	4			
WASTE WATER TREATING	2			
MAINT.	4			
LAB	2			

DJS:pb
12/11:6

1. Conduct industrial hygiene sampling per the protocol provided.

2. Advise employes, in writing, of the results of all future exposure monitoring.

3. Advise employes, in writing, of hearing loss (OSHA standard threshold shift).

4. Fit employes using only the variable size non-disposable insert type ear protection.

5. Re-evaluate the plant noise contours and identify high noise areas where ear protection is required.

6. Continue to use the present contract service for analysis of audiometric testing data until the Texaco COMEXED system is operational.

7. Implement a contractor safety program (Re memo RHH to Ref. Plant Mgrs. 10/1/84).

8. Require local exhaust ventilation or supplied-air use when personnel are welding in small confined spaces (i.e. fractionating tower).

9. Remove the SCBA from the laboratory.

10. Provide a respirator selection chart to the tool room.

11. Routinely check receipt of bottled breathing air lots for oxygen content.

12. Insure that SCBA bottles are filled to the "full" mark.

13. Hard pipe the nitrogen purge line to the muffle heater.

14. Provide TSCA 8(e) & 8(c) training.

15. Contact Mr. Lord (Houston) and advise of status of mandatory medical surveillance program.

16. Calibrate fixed hydrogen sulfide monitors monthly and document same.

17. Check laboratory hood face velocities semi-annually (minimum 125 lfpm).

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