

Interoffice Communication

To John Friend

F 29.21

From Tom Grumbles

Date November 25, 1981

Subject INDUSTRIAL HYGIENE AUDIT OF ABERDEEN PLANT

The subject audit was conducted on November 11, 12, 13 by Sid Pitts, Safety Director, LCCP, Louis Legendre, Corporate Industrial Hygienist, Ponca City, and myself. Following are the audit team's comments and recommendations. Although all applicable items on the Audit Criteria were considered, all items will not be commented on.

The overall appearance of the plant was very good. Housekeeping in process, maintenance, and storage areas was good, and eating areas within the plant were clean and orderly.

Overall administration of the industrial hygiene activities is well defined and organized. Written programs, i.e., Chemical Exposure Reduction Plan, are complete and reflect current practices. The Vinyl Chloride and Lead training programs need minor revisions to reflect the plant expansion and changes in respiratory protection devices in compounding. However, the technical content of these programs is current and correct. Frequency of training is adequate.

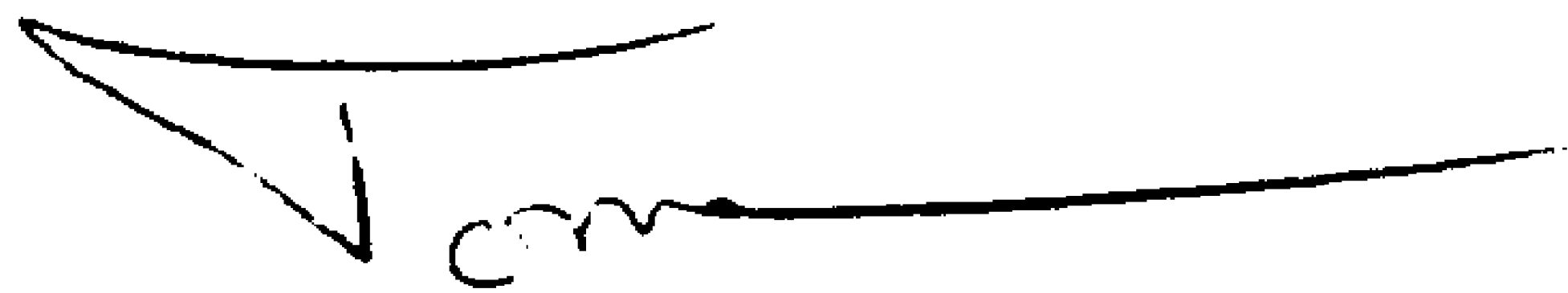
Hazard recognition and evaluation at the plant has been very complete. Many of the chemicals present in large volumes with significant exposure potential or special concern have been monitored for. Written determinations have been completed for many of the chemicals present in small volumes. Where exposures have been identified steps have been taken to reduce exposures. Exposure controls instituted in the lead handling areas have succeeded in greatly reducing exposures. This is evidenced by exposure levels as well as bio-assay results.

Recommendations

1. The laboratory currently keeps the analytical records for the passive dosimetry results for only a short time. To comply with the OSHA Records Access Standard, "... background data relevant to the interpretation of results obtained" must be kept for at least one year.
2. Currently there is no routine health training done for contractors. This general subject, contractor training requirements, has been discussed at length recently with the legal department. Although we expect further guidance from them, the plant is encouraged to begin work on a contractor training program. The content of this program probably could be abstracted in a condensed form from the existing employee education programs.

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questions on the items covered in the report. I would like to thank the plant personnel for their time in preparing for and time spent with the team during the audit.



Thomas G. Grumbles

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cc R. E. Lehmkuhl
R. D. Gamblin
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