



11-11-11

Copy to JWW

*file SAF-1H-151
Tepco USA
Puget Sound Plant*

SAFETY & INDUSTRIAL HYGIENE			
OCT. 13 1984			
JRS			
OWA	10/3	FAG	
QBY		ADG	10/3
DEAN		JWH	10/3
JH3			
VNT			
CAH	10/3	JRE	
JBW	10/3	DEAN	
PH			

DATE: September 5, 1984
TO: Mr. C. R. Ferguson
FROM: Mr. Robert A. Cox
SUBJECT: SAF-INDUSTRIAL HYGIENE
PROGRAM EVALUATION

Please refer to our May 29 subject memo and the attached concerning refinery visits by our staff and an industrial hygienist of the Research Environment and Safety Department (RESO). We would like to schedule such a visit October 9 through 11. If you prefer alternate dates please contact our Mr. Don Slack (phone 713-650-5037).

Your staff should prepare to discuss the attached questions with the survey team.

DJS/fjs

R. A. Cox

Attachment

RHH

B → JDW 10/2/84

PLAINTIFF'S EXHIBIT

TEX-46

WA-TEX 009134

WA-TEX009134

1. What respiratory protection is required for hydrogen sulfide ?
2. For asbestos ?
3. For welding in confined spaces?
4. How often is each employe formally trained/retrained in respiratory protection use ?
5. Who issues respiratory protection ?
6. Who is responsible for cleaning respirators ?
7. Who is responsible for storing and maintaining respirators ?
9. Are respirators provided if requested by employes even if not required for a certain task ?
10. Has the breathing air supplier provided a document certifying the quality of breathing air ?
11. Are any routine analysis performed on breathing air received ?
12. How often is sampling for asbestos performed ?
13. How many industrial hygiene samples were collected by refinery staff in the previous twelve months ?
14. Is any computer system used locally to record or analyze industrial hygiene sampling data ?
15. Which employes recieve annual hearing tests ?
16. Who advises employes of the results of hearing tests ?
17. Are employes advised of the results of hearing tests in writing ? Within how many days ?
18. Who trains employes to use ear protection ? How are insert type devices initially fitted ?
- 18A. Who advises employes of the effect of noise on hearing ? How often is such training provided ?
19. Who is responsible for performing noise contours ? When was the last contour performed ?
20. How many PCB contaminated electrical devices are present at the facility ? Are such devices stored at the facility ?
21. Is a current inventory and inspection record of PCB equipment available ?

WA-TEX 009135

WA-TEX009135

22. When were designated persons last trained concerning TSCA 8(e) notification ?
23. Who is responsible for recording TSCA 8(c) allegations ?
24. Have any TSCA 8(c) allegations been made in the previous year ?
25. Are MSDS currently available on operating units ?
26. Have lists of products, additives, process streams, catalysts, chemicals, etc., been prepared for all materials present in the refinery ? On each process unit ?
27. Has a written hazard communication program been prepared for the facility ?
28. How often is each employee formally trained concerning hazard communication ? Informally trained?
29. Is all safety equipment required by the Company provided at no cost to the employee ?
30. Is a written contractor safety program currently in use at the facility ?
31. Are pre-job meetings held with all contractors ? Pre-bid meetings ?
32. Are contracts reviewed by facility health and safety staff before being let ?
33. Are contractors required to submit first reports of injury ? Injury or illness records ?
34. Is health or safety equipment provided for the contractor's use ?
35. Are any licensed radioactive source materials present at the facility ? If so how many ? Who is responsible for control of these materials ?
36. Are continuous monitors required during all work in confined space ? For all hot work ?
37. What tests are routinely performed before permitting initial entry to clean a leaded gasoline storage tank ?
38. Are supplied-air respirators required for all tank cleaning jobs ?

39. Estimate the percent of industrial hygiene and safety staff time allocated to the following (total must be 100%) :

Staff work

Complaint/ accident investigation

Plant inspection

Training

Insurance claims/ loss control

Issuing permits/ inspecting permitted jobs

Industrial hygiene sampling

Litigation

All Other

40. Are employees advised of sampling results in writing ?

41. Are employees provided access to their personal medical and exposure monitoring records on request ?

42. Is exhaust ventilation required while welding in confined space ?

43. How often are lab hood face velocities measured ? What is the minimum acceptable face velocity for hoods ?

44. Are any staff members Certified Safety Professionals ?
Certified Industrial Hygienists ?

45. Are any employees required to periodically take chest x-rays ?
Pulmonary function tests ?

46. How often do employees exposed to TEL provide urine samples for medical evaluation ? Which employees are included in this program ?

THE FOLLOWING QUESTIONS CONCERN SERVICES PROVIDED TO THE PLANT

47. Are your requests for industrial hygiene information/assistance handled in a timely manner ? Are responses consistently satisfactory ?

48. List the type of assistance requests you expect to make in the near future ?

49. Are industrial hygiene sampling data reports forwarded in a timely manner ?

50. Do you find that the report recommendations identify priority needs ?

51. Do reports provide useful guidance and solutions for program needs ?

52. Are the training aids provided consistently useful ?

53. List your priority training needs for the near future ?

54. Has manpower assistance been requested in the past year to perform industrial hygiene or safety tasks for this facility ? Do you expect any such requests to be made this year ?

55. Is information concerning regulatory activity forwarded in a timely manner ? Are regulatory reviews satisfactory ?

8/84