CONOCO

Interoffice Communication

To Everitt DeWhitt

From Tom Grumbles

Date September 13, 1983

Subject INDUSTRIAL HYGIENE PROGRAMS AND PROGRAM AUDIT SYSTEMS

Below is a brief summary of the subject programs for the Chemicals Division. I believe you are aware of most by virtue of participation. I spoke with Mary Ann regarding hazard communication programs and Bill Broddle is well aware of the toxicity assessment and product liability program.

INDUSTRIAL HYGIENE AUDITS

The audit criteria is attached. All plants, except LCLAB which is scheduled this week, have had initial audits and three plants have had second round audits.

PRODUCT TOXICITY ASSESSMENT

The charter for the standing committee is attached. The function is self-explanatory and deals mainly with company products.

PRODUCT LIABILITY/MSDS

Documents describing the product MSDS program are attached. The one dealing with preparation of MSDSs is currently being revised. The system description document is to be finalized in the near future.

MEDICAL PROGRAMS

A voluntary annual multi-phasic physical exam program is offered to all operations personnel, with special tests, (i.e., blood leads) where necessary due to specific chemical exposure or regulation.

Based on the audit results all plants have well organized, functioning industrial hygiene programs that include hearing conservation, respiratory protection procedures and sampling programs.

Please let me know if you have further questions on the above.

Thomas G. Grumbles

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cc S. F. Pitts
J. R. Drumwright

CONOCO CHEMICALS: INDUSTRIAL HYGIENE AUDIT SYSTEM

BASIC GOALS

1. To assure that all feasible steps are being taken to adequately protect the health of Conoco Chemicals employees.

2. To assure compliance with federal and local regulations.

3. Assess adherence to company policies and good practice.

4. Identify areas of need based on the above and make recommendations to aid in meeting those needs.

PROCEDURE: Each plant will be audited at least every two years with actual frequency determined by need. The audit will be conducted in three phases as outlined below.

1. Pre-Audit - Prior to the audit the plant will be contacted to arrange a time of visit agreeable to all. The time spent in the plant will vary dependent on size of the plant and extent of the existing program.

   The plant to be audited will be notified of the audit criteria to enable preparation of necessary materials for review and assure the availability of key personnel to be interviewed.

2. Site Visit - The on site audit will consist of two basic parts.
   a. The majority of the audit will be performed "in-office". An opening conference will be held with management and other affected staff personnel to describe the purpose and process of the audit. The major activity will involve review of written programs, air sampling data, recordkeeping, and overall administration of the program. The specific aspects of this review are attached as Appendix I.

   b. The second phase of the audit will involve a walk-through inspection of the plant. This walkthrough will be done in OSHA style to identify obvious areas of non-compliance as well as allow for an assessment of administration and success of written programs.

   c. A closing conference will be held with appropriate plant management before the audit team leaves the plant. Audit findings, preliminary recommendations, and report format and distribution will be discussed.

3. Post-Audit - A written report of the audit findings will be addressed to the Plant Manager, with a copy to the Vice President of Operations, General Manager of Manufacturing, ~~and~~ Chemicals' Medical Director, and Corporate Industrial Hygiene Director.

AUDIT TEAM: The audit will be conducted by the Director of Industrial Hygiene, a corporate Medical Department Hygienist, and a person involved in hygiene activities from another Conoco Chemicals Plant.

5. Input to Industrial Hygiene Computer Storage and Retrieval System

6. Sampling Records

7. Sampling Equipment and Methods
   a. What's available
   b. Calibration of equipment (frequency, records, methods)

E. Hazard Control

1. Review of specific control procedures

2. Input and review of proposed process or equipment changes

3. Evaluation of newly installed controls

4. Ventilation systems review
   a. Needs and use
   b. Testing of devices (hoods, exhausters, etc.)
   c. Maintenance of systems
   d. Records of inspections

5. Respiratory Protection Program
   a. Review of program for compliance with OSHA regs
   b. Administration of program
   c. Recordkeeping.

6. Other personal protective equipment
   a. Need
   b. Selection
   c. Availability and use

F. Review of Exposure Records

1. Regulatory compliance

2. Compliance with company policies

3. Recordkeeping

G. Education Programs

1. Present program review

2. Frequency of training

3. Administration of programs

APPENDIX

CONOCO CHEMICALS INDUSTRIAL HYGIENE AUDIT SYSTEM

The following guidelines will apply to those plants receiving second round audits.

SITE VISIT

During the second audit emphasis will be placed on reviewing the initial audit report. Responses to the recommendations made in the report will be reviewed in terms of progress to achieve the recommendation or other plant action regarding the report items.

PLANT RECOGNITION OF HAZARDS

The area of employee awareness and recognition of chemical hazards, plant programs to communicate workplace hazards, and community "right-to-know" is becoming increasingly important. State and federal legislation regarding these subjects is well underway. Emphasis will be placed on assessing plant programs in these areas. Such areas include:

A) Formal education or training programs

B) Other employee information resources

C) Employee attitudes and awareness of the above items

DEVELOPMENT OF IMPROVED MSDS FOR CONOCO CHEMICALS PRODUCTS

The office of the Manager of Biomedical and Environmental affairs will co-ordinate the development of new Material Safety Data Sheets (MSDS) through the following steps:

1) Develop first draft of a new MSDS.

2) Circulate first draft to the following persons for edit and comment.

   A) Medical Division - to review first aid and medical treatment information. (CLW,M.D.)

   B) Chemicals Research Division - to review technical information, ingredients, physical data, reactivity data. FK, WLG, AJL (plastics), OCK (non-plastics)

   C) Environmental Conservation - to review toxicology information. (WDB)

   D) Plant Safety Director - to review fire and explosion data.

   E) Transportation - to review hazardous classification, transportation, and storage information. (LGH)

3) Develop final draft based on the above input and circulate to the following persons for comments:

Product Manager	L. G. Hubbard
Marketing Manager	F. Kennedy
Plant Manager	O. C. Kerfoot (non-plastics products)
Plant Safety Director	J. J. Langford
E. F. Adams	R. E. Lehmkuhl
W. D. Broddle	A. J. Lundeen (plastics products)
W. H. Chamberlain	
J. J. Doyle	V. A. Moore
N. C. Frost	C. L. Whetsone, M.D.
W. L. Groves	J. V. Withey

4) Develop completed MSDS and forward to Chemicals Research Division for printing and distribution to customers.