

CONFIDENTIAL



ETHYL CORPORATION

Inter-Office

TO: Mr. J. J. Bergin
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Mr. L. G. Cliver
Mr. W. B. Heck
Mr. B. E. Hodge
Mr. J. C. Klock
Mr. T. M. Mixon
Mr. E. O. Ponti
Mr. W. C. Strader
Mr. D. C. Townsend

FROM: S. A. D'Armond

SUBJECT: DISTRIBUTION No. 2 - Study of Occupational Safety and Health Standards
DATE: September 24, 1971

Comments herein are relative to Occupational Safety and Health standards covered in Subparts G and H code of Federal Regulations, Title 29, Chapter XVII, Part 1910. The comments derived from a study made by Plant groups identified herein.

Comments on Subparts D-E-F were issued as Distribution No. 1, dated August 13, 1971. Subparts A-B-C do not presently require study. Later distributions will be issued for revisions and/or to cover the remaining subparts which go through Subpart S.

The Baton Rouge Plant is not, or may not be, in compliance with the following Federal Occupational Safety and Health standards. (The study shows compliance with all other such standards in these subparts applicable to the Baton Rouge Plant.)

SUBPART G - OCCUPATIONAL HEALTH AND ENVIRONMENTAL CONTROL
(Studied by All Operating Supt's. --Safety-Eng. -R&D-Maint.)

Standard

Par. 1910.93 "Air Contaminants. (Gases, Vapors, Fumes, Dust, and Mist)"

Remarks:

See Exhibit "A" attached for details of the standard.

Lead Area

At the present time, lead-in-air is monitored by air sampling equipment at various locations in the TEL-TML Areas. Samples are a composite for a 24-hour period. The OSHA standard regarding TEL and TML requires that "An employee's exposure in any 8-hour work shift of a 40-hour work week, shall not exceed the 8-hour time weighted average of 0.075 mg/M³." Such exposure is not determined by the present Plant system and by means of this memorandum, this specific situation is called to the attention of Messrs. Strader and Bergin.

Sodium Area

In the Sodium plant, the Operating Superintendent says further study is needed in the use of barium chloride, calcium oxide (lime dissolving) sulfuric acid, scrubber gunk (carbon tetrachloride, chloroform, hexachloroethane, methalene chloride, and asbestos. By means of this memorandum, the Sodium Operating Superintendent is requested to spearhead such studies and notify the writer of findings.

PVC Area

As a result of study, the PVC Operating Superintendent has indicated the following questionable areas of compliance:

1. Adequacy of dust masks worn by operators in the blending area. Efficiency of dust removed by the masks should be checked if possible. The Superintendent plans to continue work on dust control to eliminate remaining dust sources as much as possible.
2. Concentrations that might develop from vaporization of materials when heated in the FCM and on the Mill. These concentrations should be determined if feasible.

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3. Autoclave Additives -- ammonia, hydrogen peroxide, sodium hydroxide and copper sulfate. These are handled in well ventilated areas. Concentrations should not be at TLV's but no actual measurements have been made. Suggest measurements be made if reasonably possible.
4. Concentrations that might develop in the air in the Compound Room. Data will be difficult to obtain. Request aid from R&D and/or others on the measurements of dust and vapor concentrations.

By means of this memorandum, the PVC Operating Superintendent is requested to spearhead studies required on above items and advise the writer of findings.

Par. 1910. 94(a)(2)(ii) "The concentration of respirable dust or fume in the breathing zone of the abraasive - blasting operator or any other worker shall be kept below the levels specified in Par. 1910. 93."

Remarks: This standard will be put in the Safety-How and supervision will be responsible for following it. Your attention is called to other workers noted in the standard. Other workers near Drum Sand-blasting Shed could be a case-in-point.

Par. 1910. 94(a)(5)(v) "Operators shall be equipped with heavy canvas or leather gloves and aprons or equivalent protection to protect them from the impact of abraives. Safety shoes shall be worn to protect against foot injury where heavy pieces of work are handled."

Remarks: This standard applies to abrasive blasting -- such as Sandblast area near Central Shops and Drum blasting area. We do not require (and therefore do not furnish) safety shoes as called for in the standard. By means of this memorandum, comments on safety shoes are requested from Messrs. Strader and Bergin.

Par. 1910. 94(a)(6) "Air supply and air compressors. The air for abrasive-blasting respirators shall be free of harmful quantities of dusts, mists, or noxious gases, and shall meet the requirements for air purity set forth in ANSI Z9.2-1960. (Note by Bill Heck-- ANSI requirement - air must have less than 20 ppm CO, 1000 ppm CO₂) The air from the

regular compressed air line of the plant may be used for the abrasive-blasting respirator if (i) a trap and carbon filter are installed and regularly maintained, to remove oil, water, scale, and odor, (ii) a pressure reducing diaphragm or valve is installed to reduce the pressure down to requirements of the particular type of abrasive-blasting respirator, and (iii) an automatic control is provided to either sound an alarm or shut down the compressor in case of over-heating.

Remarks: The Power Superintendent is requested to provide the writer with compliance data regarding air purity, and requirement (iii). It is our understanding that we are in known compliance with all other requirements in article (a) (6).

Par. 1910. 94 (b)(2) "Application. (i) Every establishment performing dry grinding, dry polishing, or buffing shall provide suitable hood or enclosures that are connected to exhaust systems."

Remarks: Maintenance is requested to list all specific locations where such work is done and send a copy of the list to Mr. Don Townsend in Engineering. Engineering is requested to analyze for compliance in reference to Exhibit "B" attached and advise the writer of findings and/or recommendations.

Par. 1910. 94(c) Spray-Finishing Operations -- See requirements in Exhibit "C" attached.

Remarks: This standard would apply to such spray painting operations as those in the Drumming Plant and Central Shops. By means of this memorandum, Engineering is requested to check compliance versus requirements called for in (6)(i) and (6)(ii) and advise the writer of findings including recommendations if needed.

Par. 1910. 95 "Occupational Noise Exposure"

Remarks: A Plantwide study has been made and reports will be issued.