

CELANESE CHEMICAL COMPANY
Chemcel Plant
Bishop, Texas



TO: J. C. Susil

FROM: G. Ille

GI-163

January 21, 1981

SUMMARY OF OSHA INSPECTION

Based on a complaint made by an Arthur Brothers, Inc. (ABI) employee, an inspection was conducted on November 25, 1980, by an Occupational Safety and Health (OSHA) compliance officer. The areas inspected included the ABI yard and Paraform and PE Bagging Warehouses. An 8-hour formaldehyde sample was collected on an ABI employee bagging paraform. In addition, a number of questions were asked concerning removal of asbestos insulation and the periodic monitoring of employees. A final report has not yet been issued by OSHA concerning the complaint.

The formaldehyde samples collected on November 25, 1980 were well below the present 3 ppm OSHA standard. The 8-hour OSHA sample indicated an average exposure of 0.5 ppm. Our sample, collected on a different ABI employee bagging paraform indicated 1.4 ppm. The difference in results may be due to:

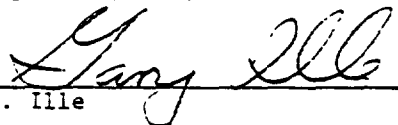
1. Different sampling and analytical procedures used. OSHA uses polarography to analyze for formaldehyde. We use chromotropic acid.
2. Two different employees were sampled.

Recommend that in the future, we sample the same individual(s) to eliminate the exposure variability between employees performing the same job. Then, if sample results are still significantly different, it may be attributed purely to the collection and analytical methods.

The following recommendations are made to ABI to increase the effectiveness of their industrial hygiene program:

1. Provide the ABI Safety Inspector with additional training in the recognition and evaluation of potential health hazards. A listing of courses is attached.
2. Review industrial hygiene monitoring capabilities. The ABI inspector should be capable of checking noise intensity levels to determine whether hearing protection should be worn and doing basic spot sampling using colorimetric indicator tubes.
3. Review and expand as required the recordkeeping system.
4. Develop a respirator fit-testing and training program.

I will be glad to discuss and expand on these ideas with the ABI Safety Supervisor.


G. Ille

jk

001052