

Interoffice Communication

To Jim DeBernardi
From Tom Grumbles
Date December 16, 1981
Subject INDUSTRIAL HYGIENE AUDIT OF VCM PLANT

The subject audit was conducted by myself, Louis Legendre, Corporate Industrial Hygienist, Ponca City, and Darrell Riffe, Safety Director, LAB Plant on December 10. Following are comments and recommendations resulting from the audit.

The plant is to be commended on deregulating the last remaining regulated area in the plant. That achievement in itself is evidence of the extent and success of the plant programs to recognize, evaluate and control potential exposure sources.

Written programs at the plant are generally in good order with only minor revisions needed in the exposure abatement program to reflect current regulatory and administrative changes. Written determinations to date are complete and in good order. As mentioned the plants air sampling program is thorough and has been utilized to identify exposure sources and evaluate subsequent control measures. Exposure levels are in compliance with applicable permissible exposure limits. Laboratory quality control of the air sample analysis is excellent, including internal machine and external (spiked) sample analysis checks. Recordkeeping on all of the above is in good order.

The VCM and Respiratory Protection education programs are in the final stages of revision and production. If they are revised as indicated these programs will be adequate. General housekeeping in all plant areas was good.

As discussed in the closing conference, following are the recommendations of the audit team.

1. Currently no routine testing of the breathing air is done. Routine testing of breathing air quality should be implemented.
2. Inspection of emergency use respirators should be done monthly and records kept of the inspections.
3. It is recommended that the written respiratory protection program contain a listing of specified respirator jobs in the plant.
4. No air sampling has been done to evaluate welding fume exposures in the shops area or during other maintenance operations. This should be done to document level of exposure. This would also help evaluate the recently installed mechanical exhaust fans in the shops.

Jim DeBernardi
Page 2
December 16, 1981

Please feel free to call me if you have questions on any of the items above.
I would like to thank plant personnel for their time spent in preparing for
and assisting in the audit.

Thomas G. Grumbles

ajo

cc R. D. Gamblin
R. E. Lehmkuhl
E. DeWhitt