

To: File

From: A. H. Sather
Date: December 5, 1985

Subject: OSHA INSPECTION

Interoffice
Communication

VISTA

At about 1:00 p.m. today, Hilton E. Kalusche, Industrial Hygienist with the Jackson, MS branch office of the Occupational Safety and Health Administration, visited the plant.

In the opening conference, he stated that this would be a partial inspection with particular emphasis on the new OSHA Hazard Communication Standard - Phase I (manufacturers and distributor portion) Compliance Status. He asked a number of general information type questions for the records. One of the questions related to whether or not there was a union. He said that there was no need to involve the union in this inspection.

He asked the current status of the training portion of our Hazard Communication program. I told him that we had developed a list of all chemicals, had done some training and had material safety data sheets on the chemicals we handled. We were, however, behind on filing all of the new material safety data sheets we had been receiving because of the volume.

He asked for copies of the material safety data sheets we provided to our customers. I obtained Vista Blue and White MSDS's for PVC, compound, dry blend and plasticizer from the lab. I also emphasized that none of the products we shipped were classified as hazardous under the regulation.

He asked to see our injury logs (OSHA 200) for 1983 through 1985. After looking at them, he recorded the totals for his summary sheet.

At the close of his inspection, I asked if we should expect anything back from the inspection. He replied that we were in good shape and nothing further would come of the inspection.

A. H. Sather

A. H. Sather

rah

cc: JF, JWW

W. L. McClain, Tom Grumbles - Houston

Copied for UEM, RAE, RAM

12/12/85 GMP

VAB.0001003554

Questions asked by Ivory Williams
7/3/86 6930-0950 on telephone

① Tank Farm Transfer pump is
called this data in 7/1/86 225 gpm @ ~~250 ft head~~ 183.3 PS

(This data was reconstructed based on actual vs design)

② Asked about operation of HL Alarm
cc if it shuts down pumps - yes

③ Can pumps be shut down manually
from CR - yes

④ Alarm Remotely in field - no
Not Staffed 100% of time - that's why
alarm is in CR

⑤ Maintenance on Relief Valves?
• Factory Service Center / ~~11~~ / 5 yrs
• level controls 72% pump S/off
60% " Start

⑥ how often is the alarm verified or
checked - every change

⑦

List of items given to Loron Canada & Jury Williams 7/2/86 - OSHA

- ① Safety Control Permit Copy
- ② Fixed Point Monitor locations
- ③ Plot plan from Vehicle entry pass
- ④ Hazard Communication plan
- ⑤ Strip Chart Copies from 6/27/86 release
for lab, old & New module.

Closing Conference 7/2/86

- Appreciate openness & information
- No citations
- impressed w/ Safety & Health Program
- Voluntary Program (Voluntary Protection P.
VPP)

- Try
- Star
- Praise

Exempt us from
Programmed inspection

TGG

Let info thru Loron - Have ~~check~~ Check

(NOTE: TGG SAID 7/3 THESE PROGRAMS WERE EVALUATED)

CONCLUSION - Adm. Burden Too Great!

① Release

- Reviewed facts
- Responded in responsible manner
- Emergency plans followed
- Redundant level control
- Send Report - when Request comes in.

② Hazard Communication Program

- Reviewed Program - no problems
- Training appears effective based on review of the interview information.

③ ? About PM on instrumentation for level controls - Calibration Checks etc - Joe Shackelford responded

7/1/86 2⁰⁰pm

REQUEST FOR ENTRY

Loren B. Canada

1. My name is Ivory G Williams. I represent OSHA-Jackson, Ms, which is established
(agency or bureau)

by the laws of the (United States) (State of MS). My official title or position is
Sr. Ind. Hygienist

Ind. Hygienist My business address is Federal Bldg. Suite 1445
100 W. Capital ST., Jackson, Ms. 39269

2. In my official capacity, I am requesting admission to Aberdeen Chemical Plant, for the purpose of:
(plant or facility)

() a. gathering scientific research information and/or studying technology development, under

(statute or popular name of act)

() b. making a regularly scheduled inspection of the facilities, under _____;
(statute or popular name of act)

() c. taking samples of water, air, or _____ (circle)
type of air monitoring equipment _____
type of water or soil sampling equipment _____
water chemical analyses (tests and methods) _____
soil chemical analyses (tests and methods) _____
location(s) for sampling _____

() d. making a special inspection of the facilities for the following purposes:

Follow up inspection after 6/27/86 Vinyl Release
in the new unit
under 1910.1017 Vinyl Chloride
(statute or popular name of act)

() e. gathering evidence for pending or potential criminal or civil proceedings, under

(statute or popular name of act)

() f. other; specifically _____,
under _____
(statute or popular name of act)

3. I specifically wish to see the following units or activities:

new module - Fresh Vcm Receiver

4. I agree to provide split samples of all samples of whatever nature obtained, and to furnish you all analytical results from all tests conducted. *Intent NOT to Sample at this point*
5. I understand that I will be furnished a guide and such other assistance as I may require for information or safety. I agree to comply with all safety regulations and instructions, whether written or oral, while on the premises.
6. I agree to indemnify and hold you harmless from and against any loss, costs, expense or liability arising out of any loss, claim, or cause of action for loss of or damage to my property or equipment, or that of my employees or agents, and injuries to or death of persons caused by, resulting from or incidental to the entry authorized hereby; provided, however, that except for loss of or damage to my property or equipment, or that of my employees or agents, such indemnification and hold harmless shall not apply to claims for loss, damage, injury or death if caused by your sole negligence.
7. I, and my employees and agents, agree to treat and maintain as confidential property of the Agency, and, except as is necessary to perform the work envisioned hereunder, shall not use or disclose to others, either during the term of this entry or thereafter, any information (including any technical information, experience, or field data) regarding products, plans, programs, plants, processes, costs, equipment, operations, or customers which may be disclosed to or come within my knowledge, or that of my employees or agents, during the entry authorized hereby. The provisions of this paragraph shall not apply to any information referred to herein which I can establish (i) has been published and has become part of the public domain, other than by my or my employees or agents acts or omissions, (ii) has been furnished or made known to me by third parties (other than those acting directly or indirectly for or on behalf of you) as a matter of legal right and without restriction on disclosure, or (iii) is required by law to be disclosed.

(Date)

(Visitor)

(Time)

(Title)

Visit authorized by:

(Agency or Bureau)

AA Sather & JWWave (acting Plant mgr)

(Plant or Facility)

TO: File

From: A H Sather

Date: 4/22/86

Subject: OSHA - General Schedule Industrial Hygiene
inspection. ~~Standard~~ 4/22/86

Edward C. Taylor - OSHA Industrial Hygienist arrived at the plant this afternoon and informed me that the plant had been selected by SIC (Standard Industrial Classification) code for ~~scope~~ a wall-to-wall type inspection.

Mr. Taylor met with Joe Ware and ~~the others~~ ^{myself} in the Conference Room. Mr. Taylor was asked to fill out our standard "Request for Entry" form. He told us he did not have authority to fill out the form and had to seek guidance from his superior. This was confirmed by phone. ~~The form was filled out by Asher~~ ~~but filled~~ Joe Ware filled the form out to get the information about the inspection scope and plans ~~that~~ ~~form~~ (attached).

H → ~~Mr. Taylor~~ ~~then asked a number of~~ ~~general questions of me relating to the plant's~~ ~~health and safety programs and~~ ~~the~~ ~~inspection~~ ~~He requested~~ ~~that the union be represented by the president or~~ ~~Adrian Steward Joe Shackelford~~

After Joe left, Mr. Taylor requested a Union Representative be present for part of the opening conference. Joe Ware arranged for Joe Shackelford to be present. Later, Mr. Taylor and Joe Shackelford conversed privately with an apparent positive result toward Vista Safety programs being left with Mr. Taylor.

The remainder of the afternoon in discussions about general plant information, basic safety and health programs and basic process flow.

He did ask specific questions about POC reactor reaction temperature and the reason for steam stripping. My response were 110-150°F for reaction temperatures and EPA requirement for steam stripping. More specific questions regarding ~~occupational~~ safety and health program information sharing with employees was that our programs were contained in a Safety and Health Manual and the amount of information sharing, ^{required} was determined on a case-by-case basis. Some programs required training programs while others were simply distributed when updated to holders of the ~~Safety and Health~~ Manual.

After the question and answer session, Mr. Taylor suggested that I assemble some things for his review on 4/23/86. The list and items I propose to show are shown below.

Item Requested

1984, 1985 OSHA 200 forms
 Airplan plot plan
 Respirator Program

Manhours Worked 1984, 5
 Average Employment 1984, 5
 VCM Unloading Procedure
 VCM overexposure protection programs

VCM / Lead Sampling Programs

Medical Programs

Blood Lead

Plan to show

- What was requested
- " " "
- 3/12/84 Program
- New program being typed for approval
- What was requested
- " " "
- VCM Tank farm operating Manual
- AHS Memo
- VCM Exposure/Emission Reduction
- (HAVE Work Practice Plan 9/20/84 available)
- Computer generated & Hand written Sampling Schedules, 1984 Inc. Frequ.
- Respirator Certification Memo
- Medical Panel for 1984 from HEI
- 1985 Intern Results w/o Names
- Other years " w/o Names if requested

4

Items Requested

Plan to give

VCM/lead/Hotal must sample results

• 1985 Sampling raw data in card form

MSDS - VCM / lead

as requested

Union Rep Walkaround

" "

An instant print camera will be taken on the plant tour 4/23/86 to photograph items as requested by Mr. Taylor for his report. The plant will use this as a screening tool to make decisions relating to confidentiality of items in photograph.

REQUEST FOR ENTRY

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(agency or bureau)
by the laws of the (United States) (State of _____). My official title or position is
_____. My business address is _____.

2. In my official capacity, I am requesting admission to _____, for the purpose of:
(plant or facility)

() a. gathering scientific research information and/or studying technology development, under

(statute or popular name of act)

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3. I specifically wish to see the following units or activities:

4. I agree to provide split samples of all samples of whatever nature obtained, and to furnish you all analytical results from all tests conducted.
5. I understand that I will be furnished a guide and such other assistance as I may require for information or safety. I agree to comply with all safety regulations and instructions, whether written or oral, while on the premises.
6. I agree to indemnify and hold you harmless from and against any loss, costs, expense or liability arising out of any loss, claim, or cause of action for loss of or damage to my property or equipment, or that of my employees or agents, and injuries to or death of persons caused by, resulting from or incidental to the entry authorized hereby; provided, however, that except for loss of or damage to my property or equipment, or that of my employees or agents, such indemnification and hold harmless shall not apply to claims for loss, damage, injury or death if caused by your sole negligence.
7. I, and my employees and agents, agree to treat and maintain as confidential property of the Agency, and, except as is necessary to perform the work envisioned hereunder, shall not use or disclose to others, either during the term of this entry or thereafter, any information (including any technical information, experience, or field data) regarding products, plans, programs, plants, processes, costs, equipment, operations, or customers which may be disclosed to or come within my knowledge, or that of my employees or agents, during the entry authorized hereby. The provisions of this paragraph shall not apply to any information referred to herein which I can establish (i) has been published and has become part of the public domain, other than by my or my employees or agents acts or omissions, (ii) has been furnished or made known to me by third parties (other than those acting directly or indirectly for or on behalf of you) as a matter of legal right and without restriction on disclosure, or (iii) is required by law to be disclosed.

(Date)

(Visitor)

(Time)

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Visit authorized by:

(Agency or Bureau)

(Plant or Facility)

EDWARD C. TAYLOR - OSHA - 4/23/86
INDUSTRIAL HYGIENIST

Gen. Schedule Inspection - Health Aspects

- May take Samples
 - Air
 - dust
 - noise

- Entire Plant -

Program Review
Records

1ST day

- Plant Tour
- Screening Samples
 - detector tubes, Sound level Meter
 - dust Monitor
- Safety Violations
- Talk to Employees in Plant
- Photographs

Days After

Joe Shackelford

↳ over protect - OSHA SAW AS POSITIVE

OSHA INSA 4/23/86

Things for ~~4/24/86~~ 4/24/86

• 1985 OSHA 200/1984 - HANDBOOKS - ^{AVL BY} EMP 85 9:00 AM

• SIMILE PLOT PLAN

• RESPIRATOR Program

• VCM UNLOADING PROCEDURE - WJ
DWH

✓ VCM OVEREXPOSURE PROTECTION PROGRAMS

• VCM SAMPLING Program

• MEDICAL Program

• EMPLOYEE VCM HEALTH TRAINING

• SIMILAR ITEMS FOR LEAD

• PAST SAMPLE RESULTS - MOST RECENT ⁽¹⁹⁸⁵⁾ COMPLETE YEAR

~~VCM OVEREXPOSURE PROTECTION PROGRAMS~~

• BLOOD LEAD RESULTS

• TOTAL DUST SAMPLE RESULTS

• MSDS - VCM / Pb

• Union Rep on Walk around

4/24/86 - Ed Taylor - OSHA INSPECTOR

NEED • VCM Compliance Plan (Get for Next time Here)

• Dale Will Accompany us on the Walkaround.

NEED • Confined Space entry

NEED • Dosimetry Card

NEED • Pb Compliance Program (Get for Next Time here)

Dec 85 → Most Current 86

LI Comp

LH Comp

CWR Com

GO L1

CO L3

Each Job Class

(photo copy of
Card results)

(4 moe data)

• filter Efficiency Specifications

- NEED • Process Flow Diagram - Separate Conf Cover
- Need • Honeywell Monitor Locations
- NEED • P1-10 Literature

Items given to Edward C. Taylor - OSHA 4/24/86

- 1984/5 200 S, Page 1
- 1984/5/6 OSHA 200 Log
- Medical Certification for Respirator Use - Memo to Employees dated 4/3/86
- 1985 VCM/LEAD/NOISE/ASBESTOS Health Training Class outline
- 1985 Respirator Training Class outline
- MSDS
 - Halbase 10,
 - Halcarb-20,
 - Halphos
 - Halthal EP
 - VCM
- Pb/dust sampling schedule
- Sept. 1985 Interim lead-blood sample results
- 1984 Routine Dosimetry Sampling Frequency Plan
- Medical panels done in Van - Appendix IVA 1984 Contract Pricing - also panels Appendix IVB
- Sound Level Survey & dosimetry of Aberdeen Chemical Plant April 1984 - Report, Appendix A & Table I
- VCM Emission/Exposure Reduction Memo w/tables - AtGather dated 7/2/86
- Taped Point Monitor locations - Honeywell unit
- Lead dosimetry summary Rec. 1985 - Mar 1986
 - 10 job classifications w/o name.

5/28/86

Ed Taylor Walkaround

CM Monitoring -

1:30P-3:20P

SUMMARIZE LAST 3 MONTHS (F, M, A)

Operation

Results

on floor

OFFICE → TANK FARM (RR/DC UNLOOKING) → CONTROL ROOM
DM - 3rd ST - Dryers - PI - Compound (L-III, IV Cont. Room) - 1st floor -

Maint Shop - Lab -

INTERVIEWED

ground level

LINES S. of 92-93rd
of Sta. 92-93rd

JEFF SHIELDS

FRED DAVIS

MIKE LANGFORD Respirator Policy?

DAVE ANDREWS / JOE SHACKELFORD

LEON GATES

ED CARNATHAN

LIPNEL STEGAL #1 D.B. HEC EX starter
Mech Interlock

ALBERT GUNN

M.L. KATON

RICKY McMillian

CHARLES REED

JOHN SUTTON

JOHN HULL

BILL McALISTER

5/29/86 Closing Conference - Ed Taylor

Walk around

- Very good program
 - Employee comments - Stay on us too Much.
 - Programs are being fulfilled
- Safety Meetings, Training programs.

Exposure Records

- Company Exposed Requirement • Medical
 - Monitoring
 - Results indicate we are W/in Compliance limits
- Employees are being told of health hazard

Points brought up during Walkaround

- 1) Respirator Program.
 - ↳ Contractor program - HCR
 - ↳ after Contractor is aware of hazards (by Vista) it is his responsibility. By Standard
 - ↳ Contractor is liable

2) Crane - Maintenance & Certification

Sds

- Program
- Crane Certification
- Maintenance
- Employee Training

JWW Plant response ESAR - already filed.
→ P-H Program in place
→ Investigation incomplete

3) Hydraulic Jack - Seal Changing

- Protective Screen to protect employees

4) #1 Welox M.C.C. 25000 Starter

- EE is the expert - OSHA will rely on the judgement of the EE.
- R.E. Polk comments reviewed.

No Citation

- Taylor To write up & this case file will be closed

- Complaint may cause a further inspection
- The discussion items will be written into the file - This will establish knowledge.



Feel free to call for assistance

- State Consultation program Available
- Henry Laird Director



- Union can call for assistance