

CHEMICALS

123
INDUSTRIAL

INTEROFFICE / LAKE CHARLES

TO R. E. Hanna

DATE June 17, 1974

FROM B. W. Walker *BW*

SUBJECT OSHA Inspection #2

DATE OF INSPECTION:

June 12 - 13, 1974

COMPLIANCE OFFICER:

Steven D. Herron

CAUSE OF INSPECTION:

Routine - (VCM Process)

UNION REPRESENTATIVE:

Mitchell Andrews
Bill Andreas

MANAGEMENT REPRESENTATIVE:

Bob Lynch
Bryant Walker

OPENING CONFERENCE

Mr. Steven D. Herron, Industrial Hygienist with the Department of Labor, arrived at the Lake Charles Plant on June 12, 1974. He requested to see a management representative and was referred to Murry Davis, Safety and Security Director. An opening conference was established at Dewey Duncan's office with the Compliance Officer, D. L. Duncan, R. E. Hanna, J. M. Davis and B. W. Walker present at the conference. A questionnaire concerning VCM and PVC was given to Mr. Duncan to be filled out by his choice of personnel. Another questionnaire was given to R. E. Hanna concerning routine information, i.e., number of employees, names of PPG Officials, address, etc. Mr. Herron asked questions from another questionnaire which established whether PPG is covered by the law and other routine questions. Mr. Herron was asked for some identification and he presented his Department Of Labor Credentials. Mr. Herron stated that his primary purpose was to inspect our VCM process and VCM shipping. He also stated that he would like to inspect our asbestos insulation shop and storage area if he had time. Mr. Herron requested an interview with an employee representative. Mitchell Andrews was called to Mr. Duncan's office for the interview with Mr. Herron. After the interview, Mitchell Andrews stated that Bill Andreas would accompany Mr. Herron on the inspection. Mr. Duncan informed Andrews that the employee representative would not be paid by PPG during the inspection. Mr. Duncan appointed Bob Lynch and Bryant Walker as the employer representatives for the inspection.

INSPECTION

The inspection began in the Safety Director's office so that Mr. Herron could review our accident records. All recordkeeping was in compliance with OSHA.

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Mr. Herron also reviewed our personnel and area monitoring results of VCM exposure.

After inspection of the records, Mr. Herron proceeded to the VCM plant to inspect the facilities and monitor an operator for VCM exposure. John Jordan, VCM Operator, and Bill Andreas were questioned in private by Mr. Herron before the samples were taken. Jordan was asked to collect a VCM sample so that an air sample of his exposure to VCM could be taken. Our lab personnel took air samples at the same time. A picture was taken of Jordan as he attached a sample container to the VCM sample line. Jordan was also monitored as he analyzed the VCM sample in the VCM plant lab. Another picture was taken in the plant lab. Before leaving the VCM plant, John Jordan explained that he had operated the wrong valve on the sampling job which caused VCM to spray out onto his hands. Mr. Herron stated that this will not cause the sample to be invalid due to the probability of this type of incident occurring at any time.

Mr. Herron then requested to be taken to the Shipping Department VCM Tank Car Loading Rack for inspection. After arriving at the loading rack, Mr. Herron determined that monitoring would not be necessary due to new innovations which eliminated exposure. His conclusion was reached after a discussion of the loading procedure with Dean Thibodeaux, Shipping Department Loader, and Charles Burns, Shipping Department Foreman.

After leaving the loading rack, Mr. Herron requested to see our asbestos operation in the Cell Repair Area. Mr. Herron inspected the asbestos storage area first and then walked through the Cell Repair Area. The following proposed violations were noted by Mr. Herron on his first inspection of the Cell Repair Area.

1. Failure to post appropriate asbestos hazard warning signs in the asbestos storage and handling areas and on containers which contained asbestos.
2. Failure to keep a safety shower unobstructed for use. (A floor fan had been placed under the safety shower.)
3. Failure to utilize eye wash fountains in place of hose attached to safety shower.
4. Failure to maintain bench grinder in compliance with standards.
 - a. The tool rest was not adjusted within 1/8" of the wheel.
 - b. The top of the guard opening was greater than 1/4" between the wheel and the guard.
5. Failure to provide a safe walking surface around a wet operation. (Water on floor around cathode dip tanks and around cement mixing operation.)

When Mr. Herron noticed the lead pouring operation, the asbestos fluffing operation, and the solder wiping operation, he decided to return the following day to obtain personnel monitoring samples on each operation. Before leaving he stated that he would conduct a closing conference and would like to review our monitoring records on the above mentioned operations.

We proceeded to the Safety Director's office to look at the records and have the closing conference. M. Davis produced the monitoring records as requested and Mr. Herron asked for a copy of each. Copies of the records that were given to Mr. Herron are attached as attachments #1, 2, and 3. The closing conference was conducted and will be discussed in a later paragraph.

The following day, June 13, 1974, Mr. Herron obtained personnel monitoring samples from Dennis Clifton and Sydney Clemet on the lead pouring operation; from Peter Carrier on the asbestos fluffing operation; and from Robert Hartman on the solder wiping operation. After Hartman completed the solder wiping operation, Mr. Herron requested an examination of the respirator due to Hartman coughing during the operation. Upon examining the MSA Comfo Respirator, it was found to contain two Mersorb cartridges on it instead of the required GMA organic vapor cartridges. This resulted in another proposed violation and possible citation.

6. Failure to provide proper respiratory protective equipment.

CLOSING CONFERENCE

A closing conference was conducted on June 12, 1974, with Mr. Herron, Bob Lynch, J. M. Davis, B. W. Walker and Bill Andreas present at the conference. I should point out that it was the employer's prerogative to allow the employee representative to be present at the closing conference. Mr. Herron explained the proposed violations and the employers responsibility in handling any citations resulting from such proposed violations. He also explained that due to a delay in receiving his sample results, it may be six weeks to two months before any information on the sampling would be available. If the results of the samples indicate a violation of the allowable concentrations, we could receive additional proposed violations which could result in citations. In reviewing the proposed violations, it was pointed out to Mr. Herron that the specific standard covering safety showers and eye wash facilities allowed the use of a hose attached to the safety shower. Mr. Herron stated that it was the Area Director's interpretation that "eye wash fountains" must be installed. He remarked that he would check this proposed violation with the Area Director and call us on the decision if it results in a proposed violation.

CONCLUSION

All violations noted by the Compliance Officer are only proposed violations that may or may not result in a citation. Issuing citations and establishing

penalties is the prerogative of the Area Director for the Louisiana Office. If a citation is issued, the violation is considered as alleged until a 15 working day waiting period ends after issuance. During this 15 day period, the employer has an opportunity to contest the proposed violations. If they are not contested, the proposed violations are considered as violations and must be corrected within the prescribed abatement period.

Personnel monitoring samples were taken by our lab personnel each time the Compliance Officer took samples. The results of our sampling are as follows with the TLV indicated for each chemical.

<u>ITEM</u>	<u>RESULTS</u>	<u>TLV</u>
VCM - Process Operator	5.0 ppm	50 ppm
VCM - VCM Lab	2.2 ppm	50 ppm
Lead - Feed Pot	71 $\mu\text{g}/\text{m}^3$	200 $\mu\text{g}/\text{m}^3$
Lead - Pourer	34 $\mu\text{g}/\text{m}^3$	200 $\mu\text{g}/\text{m}^3$
Lead - Soldering Job	169 $\mu\text{g}/\text{m}^3$	200 $\mu\text{g}/\text{m}^3$

BWW/bc

Attachment (3)

cc: A.T. Raetzsch
D.L. Duncan
R.E. Baker
T.G. Taylor
J.M. Davis
L. Krause
J.H. Morgan
R.P. Lynch
R.E. Eakin
J.C. Lafleur
H.J. Hoenes
C.A. Burns
E.L. Cook
H.C. Underwood
R.E. Sourwine

LEAD-IN-AIR DATA SINCE 1969

<u>Monitored Personnel or Area</u>	<u>Date</u>	<u>Comments</u>	<u>Method</u>	<u>Pb Conc., mg/M³</u>
Pb Pot Operator	4- 2-69		A	< 0.05
Solder Pot Operator	4-25-69		A	0.20
Solder Pot Operator	5- 2-69		A	0.15
Pb Pot Operator	10- 7-69		A	0.05
Solder Pot Operator	10- 7-69	Sampled ONLY while wiping bus bars with molten solder.	A	> 0.40
Solder Pot Operator	10- 7-69		A	0.10
Pb Pot Area	2- 4-71		B	< 0.05
Solder Wiping Area	2- 4-71		B	< 0.05
Pb Pot Area	3-15-71		B	< 0.05
Solder Wiping Area	3-15-71		B	< 0.05
Pb Pot Area	11- 8-71		B	< 0.05
Solder Wiping Area	11- 8-71		B	< 0.05
Solder Wiping Area	11- 8-71	Sampled ONLY while wiping bars.	B	0.05
Pb Pot Area	11-10-71	Sampled ONLY while pouring lead.	B	0.10
Pb Pot Area	3-14-72	Sampled while removing slag from Pot	B	0.05
Pb Pot Area	3-14-72	Sampled while pouring lead.	B 8:30	< 0.05
Pb Pot Area	3-14-72	Sampled while pouring lead.	B	< 0.05
Solder Wiping Area	3-14-72		B	< 0.05
Solder Wiping Area	3-14-72	Sampled while wiping bars.	B	< 0.05
Pb Pot Area	11-10-72	Sampled while pouring Pb.	B	< 0.05
Solder Wiping Area	11-10-72	Sampled while wiping bars.	B	0.05
Pb Pot Area	6-21-73	Sampled while pouring lead.	B	< 0.05
Solder Wiping Area	6-21-73	Sampled while wiping bars.	B	< 0.05

Method A: MSA Personnel Monitor, 12 to 48 min samplings.

Method B: MSA Universal Pb Test Kit, approximately 2 min sample near personnel.

ATTACHMENT #1

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To: Dr. H. B. Lovejoy 
From: Tommy R. Vizona

Date: June 3, 1974

Subject: Houston Chemical's results
on blood & urine lead.

EMPLOYEE	DATE OF SAMPLE	VOL. LITERS	SP. GR.	UNCOR.	URINE mg/L COR. (1.024)	BLOOD mg/100 gm
Alton Thomas	4/17/74	0.68	1.024	0.038	0.038	0.033
Murlin Fontenot	4/26/74	0.64	1.018	0.033	0.044	0.062
Emmanuel Guillory	4/17/74	0.56	1.021	0.057	0.065	0.053
Robert Hartman	4/17/74	0.60	1.017	0.035	0.049	0.058
John McNabb	4/26/74	1.60	1.011	0.021	0.047	0.030
Charles DeJean	4/19/74	0.86	1.002	0.027	0.324	0.100
	5/15/74	0.44	1.030	0.145	0.116	
Clifton Dennis	4/26/74	0.58	1.029	0.041	0.034	0.045
Peter Carrier	4/19/74	2.88	1.007	0.034	0.120	0.041
Jos. Guidry -	4/22/74	0.48	1.026	0.035	0.032	0.060
Raymond Landry	4/16/74	0.74	1.025	0.027	0.026	0.050
Wickley Boullard	4/26/74	0.34	1.020	0.033	0.040	0.051
Simon Woods	5/15/74	1.74	1.012	0.024	0.048	

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ATTACHMENT #2

AIR SAMPLES FOR METAL FUMES AND DUSTS

Pb, Sn, Cu, Zn

<u>Date</u>	<u>Type</u>	<u>Duration</u>	<u>Job or Area</u>	<u>Concentration, µg/M³</u>	
3-06-74	Personnel	5 Hours	Anode Pouring (Dejean)	880	Pb
3-06-74	Personnel	5 Hours	Solder Wiping (Guillory)	580	Pb
3-08-74	Personnel	4 Hours	Anode Pouring (Clifton)	170	Pb
3-08-74	Personnel	4 Hours	Solder Wiping (Clement)	1,030	Pb
3-13-74	Personnel	3 Hours	Anode Pouring (Dejean)	340	Pb
3-13-74	Personnel	3 Hours	Solder Wiping (Guillory)	(310 (280)	Pb Sn
3-13-74	Area	3 Hours	Lunch Table	77	Pb
3-14-74	Personnel	3 Hours	Lead Pot Addition (McNabb)	500	Pb
3-14-74	Area	3 Hours	East Wall on Temperature Recorder	25	Pb
3-15-74	Personnel	3 Hours*	Maintenance Welder-Copper (Hayes)	450	Cu
3-15-74	Area	6:3 Hours	Between Pb Pots	69	Pb
3-15-74	Personnel	2.5 Hours	Cathode Hand Tinning (Hartman)	(35 (14 ((29 as ZnCl ₂)	Pb Zn

Threshold Limit Values
for
Above Metal Fumes and Dusts
(from OSHA Tables)

Pb (Lead, inorganic)	200 µg/M ³
Sn (Tin, inorganic)	2,000 µg/M ³
Cu (Copper, fume)	100 µg/M ³
Cu (Copper, dusts and mists)	1,000 µg/M ³
Zn (Zinc chloride fume)	1,000 µg/M ³

* 3 hours continuous cutting of copper with copper rod.
This type of work done approximately once in two weeks (3 hours).

ATTACHMENT #3

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