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TO: John Friend

FROM: Tom Grumbles
DATE: October 8, 1985

Interoffice Communication

SUBJ: ABERDEEN PLANT INDUSTRIAL HYGIENE PROGRAM ASSESSMENT

VISTA

The program assessment was conducted on September 24 - 25. The team consisted of myself, Keith Fogg, Safety Director LAB plant, Dr. Drumwright; Medical Manager, and Michele Goodreau, Environmental and Health Specialist. Action taken on the recommendations from the 1983 audit report were reviewed and discussed. Interviews were held with personnel in the safety department, various hourly operations and laboratory employees, and operations and mechanical supervision.

Interviews with staff indicated a good awareness of and commitment to the industrial hygiene program. In particular, the supervisory follow-up on measured overexposures to find exposure sources is good. Employee interviews did not reveal any overt health or safety concerns. The mechanical department does safety audits on a random basis and uses a form to assure consistency in this effort. This type of "self-auditing" is a very positive idea and certainly encouraged.

Below are the assessment team's recommendations. Items noted on the walk-through inspection and discussed with you are not included below.

1. A large amount of time was spent reviewing and discussing the respiratory protection program. Specific recommendations are below.

   a. The respiratory protection program should contain specific selection criteria for respirator use. The program lacks specificity as to the selection criteria for specific jobs, or classes of jobs with known exposure potential. There appears to be some confusion as to what equipment should be considered in VCM service and subsequently what respiratory equipment is needed for jobs on that equipment.

   b. Reference was made in conversations to various letters that had been issued addressing specific uses of respirators. These "guidance" letters should be consolidated into the program.

   c. The manufacturer instructions included in the program as appendices should be reviewed and consideration given to removing them from the policy. They are redundant in many cases and of little practical use as written.

   d. Based on action taken in (a) and (b) above, Section II, Selection and Approval of the program should be revised to reflect actual plant practices.

2. In Blending and Compounding several recommendations regarding lead exposures are made below.

   a. Maintenance personnel work in the lead areas and are included in the blood lead program. Consideration should be given to monitoring maintenance jobs in this area to determine airborne lead exposures. This could be area monitoring if done carefully.

   b. A review of personnel clean-up procedures at the end of shift should be done to assure proper disposal of contaminated work clothing, and that personal hygiene guidelines are followed.

   c. To obtain a total dust measurement approximately one-third of the lead air samples are handled at the plant before shipment to the analytical laboratory. This practice should be stopped as there is potential to disturb the integrity of the lead analysis. Total dust numbers could be obtained by the laboratory being used for lead analysis.

3. To determine the effectiveness of exhaust ventilation systems and quantify exposures, air sampling of welding operations in the maintenance shop should be considered.

4. Further sampling of short-term exposures should be done to determine respiratory protection needs and workplace procedures.

   For recognized high potential exposure jobs where air-supplied equipment is used, a review of "job-site" preparation should be done to preclude casual exposures to those not directly involved in the job.

5. There was some concern expressed during interviews regarding the validity of the VCM monitoring. Several instances of measured overexposures on personnel who never entered the vinyl area on the day of sampling were mentioned.

   The quality control program that I was to assist the plant in developing has not been developed. I still plan on proposing a mechanism to independently verify the sampling and analytical methods the plant is using.

Please let me know if you wish to discuss any of the above. We are available to assist in accomplishing the above recommendations. I want to thank-you and your staff for their time and cooperation during the plant visit.

Thomas G. Grumbles

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cc RDG, JRD, KLF, ALS