

JCH: JGL: TGG: RF

XF: _____

TO: Keith Fogg

FROM: Tom Grumbles

DATE: May 16, 1985

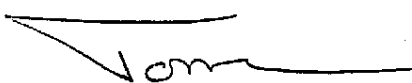
SUBJ: RECORDKEEPING REQUIREMENTS FOR
FIXED POINT MONITORING DATA

Interoffice
Communication

VISTA

To confirm our discussion regarding the applicability of the OSHA Medical and Exposure Records Access Standard to fixed point monitoring, I have attached an opinion from Legal. Basically fixed point data, as we take it and use it, is not generally construed as employee exposure data and does not have to be retained for compliance with the OSHA standard. However, you should check with plant environmental personnel to determine if they have needs for the data.

I would recommend that some form of data summary be maintained to be used in the event of litigation. This could be weekly, or whatever is reasonable based on your systems operation.


Thomas G. Grumbles

Attachment

cc: Bob Seymour
Bill McClain

VVV 000023329

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Interoffice Communication

To Tom Grumbles
From Michele Malloy
Date September 27, 1983
Subject APPLICABILITY OF 29 CFR 1910.20 REQUIREMENTS TO
FIXED POINT MONITORING DATA

Based on our discussions and my understanding of the function and the data collected by these in-plant systems, it would not be subject to the recordkeeping requirements of 29 CFR 1910.20(d)(1)(ii), Employee Access to Medical and Exposure Records.

Fixed point monitors can be useful tools in the control, as opposed to the measurement, of employee exposures by indicating the concentration of a chemical in the air at a particular point, at a particular time, detecting leaks, and generally determining the effectiveness of control devices. This information can be useful to trigger alarms or provide early indications of increased concentrations. However, personal exposure monitoring remains the significant manner to determine employees' exposure. The ultimate question is the amount of contaminant to which an employee is actually exposed, not merely the level of contaminant in a certain place at a certain time. "Exposure monitoring" is the monitoring done with the purpose and capability of actually measuring the employee's breathing zone exposure.

Therefore, it is my opinion that fixed point monitoring data would not generally be construed as employee exposure records.

Michele Malloy

Counsel

cc

VVV 000023330

JUH: JOL: TGG: RF
XF: _____

TO: Keith Fogg

FROM: Tom Grumbles

DATE: May 16, 1985

Interoffice
Communication

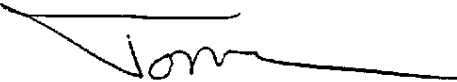
SUBJ: USE OF EMERGENCY ESCAPE (MOUTHBIT) RESPIRATORS

VISTA

The following is to confirm our discussion regarding the subject respirators.

1. I am not aware of data indicating the effectiveness of the respirators we use for HF acid vapors or mist. It would be difficult for us to quantify the use limitations in terms of maximum use concentration for these respirators.
2. In reviewing the process area, with the exception of elevated areas, escape routes are generally very short and the time it would take to exit the affected area would often be less than it would take to put on the respirator.
3. Procedures and work practices, such as locating respirator supplies on elevated platforms, can be instituted to make respirators available for escape from these areas.
4. Current plant practice results in a very large number of respirators being in use (carried) at all times. To effectively monitor the condition, storage, and operating integrity of these respirators to assure the proper working condition in the event of an emergency is difficult at best.

In summary, I would agree that the current use practices for the mouth bit respirators could be modified, as discussed, with no subsequent decrease in employee safety. This change would include administrative procedures to assure availability of the respirators on elevated platforms or areas.


Thomas G. Grumbles

cc: Bob Seymour

VVV 000023331