

TO	Distribution	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
FROM	Jerry L. Miller	FIELD POINT OR DEPT. & BLDG. NO. LaPorte Plant	DATE THIS LETTER February 10, 1983
SUBJECT	LAPORTE PLANT HYGIENE REPORT FOR THE MONTH OF JANUARY, 1983		

PERSONNEL MONITORING

There were a total of 27 samples recorded during January. The monthly VCM average indicated $<.1$ ppm. The average EDC results indicated 1.12 ppm. This EDC average included (1) one maintenance man who was exposed to 16.5 ppm. Investigation into this was conducted and corrective action taken. Dosimeter readings for noise exposure have begun and their results will be forthcoming.

SAFETY

There were no lost time or recordable injuries for the month.

AREA MONITORING

	<u>January</u>	<u>December</u>
VCM Storage	.16	.07
VCM Loading	.07	.1
Quench Area	.11	.04
Incinerators	.01	.01
VCM Process	.11	.04
EDC Process	.18	.9
Laboratory	.04	.03


Jerry L. Miller

JLM:bjh

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BFG44932

TO	Distribution	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
FM	Jerry L. Miller	LaPorte Plant	DATE THIS LETTER January 7, 1983
SUBJECT			

LAPORTE PLANT HYGIENE REPORT
FOR THE MONTH OF DECEMBER, 1982

(T)

PERSONNEL MONITORING

There were a total of 26 samples recorded during December. The monthly VCM average was $<.1$ ppm. The average results indicated for EDC were .73 ppm.

The noise dosimeters that were recently purchased were out of calibration and had to be sent back to the manufacturer. This has put a mild slow down on this program.

SAFETY

There were no lost time accidents recorded during December, however, one recordable resulted. The LaPorte Plant completed 1982 with three (3) recordables.

AREA MONITORING

	<u>December</u>	<u>November</u>
VCM Storage	.07	.13
VCM Loading	.1	.09
Quench Area	.04	.04
Incinerators	.01	.13
VCM Process	.04	.03
EDC Process	.9	.04
Laboratory	.03	.01

Jerry
Jerry L. Miller

JLM:bjh

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BFG44933

TO	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
Distribution		
FROM	FIELD POINT OR DEPT. & BLDG. NO.	DATE THIS LETTER
Jerry L. Miller	LaPorte Plant	December 9, 1982
SUBJECT		

LAPORTE PLANT HYGIENE REPORT
FOR THE MONTH OF NOVEMBER, 1982

I. PERSONNEL MONITORING

There were a total of 37 personnel samples recorded during November. The monthly VCM average was .14 ppm. The monthly EDC average results were .65 ppm. Personnel and area results were obtained for the second transfer of Convents Heavy Ends. These samples were transferred to Brecksville for further interpretation. Noise dosimeter program has been initiated, results have yet to be entered into computer.

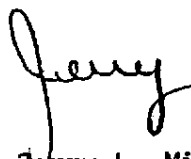
II. SAFETY

There were no lost time accidents during the month, however, one recordable resulted. That makes a total of two recordables for 1982.

III. AREA MONITORING

	<u>November</u>	<u>October</u>
VCM Storage	.13	.15
VCM Loading	.09	.12
Quench Area	.04	.07
Incinerators	.13	.05
VCM Process	.03	.05
EDC Process	.04	.10
Laboratory	.01	.03

We are in the process of reducing the detectable alarm level on the area monitoring system from 5 ppm to 3 ppm.



Jerry L. Miller

JLM:bjh

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TO	R. Henderson	FIELD POINT OR DEPT. & BLDG. NO. LaPorte, Texas	DATE YOUR LETTER
FROM	T.S. Bialke	FIELD POINT OR DEPT. & BLDG. NO. Akron - D/0020, 5-H	DATE THIS LETTER 5-5-82
SUBJECT	Industrial Hygiene Survey March 24-26, 1982		

In general, I found plant personnel to be enthusiastic and very much committed to ensuring that all LaPorte employees are being protected against health hazards.

LaPorte has to purchase VCM and noise monitoring equipment so that the plant can comply with BFGoodrich and Federal OSHA monitoring requirements. The weld shop at LaPorte needs attention to bring it in compliance with OSHA welding ventilation standards.

The frequency of monitoring for VCM and administration of physical exams are in order.

I wish to thank Jerry Miller for the courtesies shown me and for his enthusiastic assistance in making the survey a profitable one.

Please address the recommendations contained in this report within 60 days after receipt.

T.S. Bialke
T. S. Bialke

V

cc: ~~E.B. Katzenmeyer/H.W. Dietz~~ */file*
E. Martinelli/H. Waltemate/R. Krueger
W.C. Holbrook/W.C. Becker
J. Miller/S. Brouillard
G. Lefebvre/G. Hoby

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LaPorte Ind. Hygiene Survey

<u>Survey Findings</u>	<u>Recommendations/Comments</u>	<u>Responsi- bility</u>	<u>Exp. date of Completion</u> 1.
1. The plant's current method of monitoring and analyzing for VCM does not meet BFGoodrich requirements.	1. The LaPorte Chemical plant is using the duPont passive organic vapor badge for monitoring of VCM. The BFG Environmental lab in Brecksville has not approved the duPont badge method for VCM monitoring. No passive organic vapor monitoring system meets the accuracy and precision requirements established by the OSHA VCM standard. The standard approved method for VCM monitoring is the BFG Chemical Group's procedure #1021A which employs collection of VCM on reusable PMCC tubes that are thermally desorbed with G.C. analysis. A Bendix flasher unit is available from Applied Sciences, State College, PA at a cost of \$1,050. PMCC tubes can be purchased from Bendix, Process Instrument Div. Once the flasher method is established, sample each process worker, i.e. workers having daily potential exposure to VCM. one time per month, for six months, at which time the results should be reviewed with the Environmental Health department in Akron.		
2. All plant areas have been surveyed for noise with areas greater than 90 dBA posted as noise hazardous with a maximum amount of time permitted in areas noted on the sign.	2. Using previous noise survey data, repost areas greater than 85 dBA as noise hazardous and require hearing protection to be worn per BFG OHP 5.05. Delete references to the amount of time employees are permitted to spend in areas without hearing protection. Such protection will not be required in areas over 85 dBA if a person is "just walking through" from one area to another.		
3. No noise dosimeter data collected on job classes.	3. To comply with OSHA's hearing conservation amendment, it will be necessary for LaPorte to obtain at least three readings per employee in each job class. After collection of three readings, collect a minimum of one dosimeter reading per employee per year. One noise dosimeter kit containing five dosimeters will adequately cover the needs of both LaPorte and Deer Park.		

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LaPorte Ind. Hygiene Survey

Survey Findings

4. No formal review of new chemicals use and handling prior to allowing chemical into the plant.

5. Welding shop with no local exhaust ventilation. Dimensions are 40 ft. long by 34 ft. wide by 13.6 ft. high. Five welders are assigned to the shop.

Recommendations/Comments

4. Procedures for review of chemicals that previously have not been stored or used within the plant need to be formalized. The purpose of such a requirement is to ensure that no chemical is brought into the plant without its potential harmful effects being known and all appropriate steps to ensure safe handling firmly established. Attached is a copy of the Port Neches chemical plant's control of new chemicals procedure. It provides for very tight control over new chemicals and clearly defines responsibilities of plant management.

5. OSHA 29 CFR 1910.252 (f)(1)(ii), f(2)-(4) establishes ventilation requirements for welding purposes. Local exhaust ventilation is required when welding, cutting or brazing is done involving fluorine compounds, zinc, lead, beryllium or cadmium. Local or general exhaust ventilation is required for welding not involving the above compounds when welding is done under any of the following conditions: (a) in a space of less than 10,000 cubic ft. per welding, (2) in a room with a ceiling height of less than 16 ft., or (3) where barriers exist that significantly reduce cross ventilation. The LaPorte welding shop has an internal space of only 18,500 cubic ft. and a ceiling height of 13.6 ft.; both situations clearly require installation of local exhaust ventilation for welding fume removal.

In a separate letter I have previously provided J. Miller with information on commercially available local exhaust ventilation units.

Responsi-
bility

2.
Exp. date of
Completion

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LaPorte Ind. Hygiene Survey

Survey Findings

6. Annual respirator training needed to incorporate qualitative fit testing.

Recommendations/Comments

6. Since the Diamond-Shamrock quantitative van is no longer available to LaPorte, the plant will have to incorporate a qualitative fit testing procedure into its annual respirator training session. Procedures for conducting this test are contained in Attachment II.

Responsi-
bility

3.
Exp.date of
Completion

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Discussion:

Tables I and II contain the monitoring results obtained for vinyl chloride/ethylene dichloride, and noise respectively. All EDC results were well below the allowable limit; two out of three VCM results were below the lower detection limit of the analysis; one VCM sample on the EDC operator was 1.0 ppm. The employee worked on a VCM transfer pump using respirator protection.

No recommendations can be made as a result of this data. All LaPorte job classifications are to be reevaluated using the flasher method.

Table II lists the noise dosimeter results. All results are time weighted over the 12 hour shift length. The OSHA allowable limit is 100%. For an 8-hour shift, a 100% reading would be equivalent to a continuous employee exposure to 90 dBA for 8-hours. For a 12-hour shift, a 100% reading would be equivalent to a continuous 87.5 dBA exposure. Readings in excess of 100%, regardless of shift length, are above the OSHA allowable limit. Exposures above 100% have to be controlled through engineering, or a combination of work practice changes and hearing protection requirements. For hearing conservation purposes, exposures above 50% require hearing protection to be worn in areas with greater than 85 dBA noise exposure. Three sample results were above the 50% limit and one was just above the 100% limit. The 106% reading on the utilities operator was due to his working in the compressor area, a posted noise hazardous area. This individual wore hearing protection. The other two readings above 50% were due to workers performing tasks in other defined noise hazardous areas. These few samples point to the need for the LaPorte facility to conduct noise dosimetry on all job classes to identify those that have a potential for exposing employees to noise in excess of the standard. If exposures in a job class are significantly and consistently above 100%-125%, engineering controls of noise sources will have to be investigated.

TSB

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TABLE I.

AIR SAMPLING RESULTS
LaPorte, Mar. 25, 1982

<u>Name/SS#</u>	<u>Job Title</u>	<u>Sample Time (min.)</u>	<u>Concentration (ppm)</u>
C. Saloana 453-64-2458	EDC operator	395	0.1 ppm VCM 0.1 " EDC
R. Venable 450-94-4117	Roving head operator	329	0.1 " VCM 0.1 " EDC
S. Schultz * 459-66-6059	EDC operator	392	1.0 " VCM 1.3 " EDC

* Worked on VCM transfer pump.

TABLE II.

NOISE SAMPLING RESULTS

<u>Name/SS#</u>	<u>Job Title</u>	<u>12 Hr. TWA - %</u>	<u>Wore Hearing Protection</u>
F. Manahan 449-96-4389	Oxy-chlor operator	35	yes
S. Delasboure 449-13-2925	Oxy operator	44	"
L. Geters 453-98-2418	VCM operator	53	"
G. Kelley 457-80-4962	VCM operator	53	"
Denny Ayres 287-48-4868	Utilities Operator	106	"

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