

TO: Plant Safety Directors

From: A. H. Sather

Date: Current

Subject: OSHA INSPECTIONS - ABERDEEN CHEMICAL PLANT

During the Second and Third quarter of 1979, the Aberdeen Plant was inspected by ~~the~~ Federal OSHA ~~an~~ inspectors on two occasions. The purpose of this Memo is therefore intended to share our experiences in an effort to reduce ~~the~~ CONOCO CHEMICALS COMPANY'S exposure to citations.

Industrial Hygiene Inspection

Two Jackson, Ms. based OSHA inspectors arrived in plant on May 15, 1979 and concluded their plant inspection activities on May 31, 1979 following what amounted to seven (7) full days of activity. They began their inspection by a brief introductory visit with C. L. Miller - Plant Manager on the afternoon of May 15, 1979. The inspection was formally opened ^{the morning of} on May 16, 1979 with an opening conference. The remainder of the day (approximately seven (7) hours) was spent reviewing the plant's Safety Program, chemicals used in the plant, ~~and~~ our industrial hygiene monitoring ^{methods and} records. The course of the inspection was determined from the information and data gained during this review. The Walkaround was conducted on ~~the~~ May 17, 1979. Joe Shackelford, Union president was present during all ^{portions} ~~the~~ of the Walkaround.

PLASTIC VESSEL/SPLASH INVESTIGATION (Cont.)

Plastic Vessels - J. V. Uptain - Safety, F. W. Frantz - Maintenance, and
V. L. Thornhill - Process Engineering.

Splash/Spill Hazards - E. L. Kieschnick - Vinyl Operations, C. R. Miller -
Compound Operations, J. R. McCrimon - Process Engineering,
and A. H. Sather - Safety.

The reports were compiled and issued to C. L. Miller who assigned priorities for corrective action and distributed the final document to responsible personnel.

OSHA INSPECTION

On May 15, 1979, inspectors from the Occupational Safety and Health Administration initiated an industrial hygiene inspection which was initially directed toward the handling of VCM. After the plant walk-around, some interest was shown with regards to lead handling in the compound area. The inspection lasted essentially seven (7) full days (May 16, 17, 22, 23, 24, 31 with half days on May 18 and 25, 1979).

The initial activity involved a detailed review of personnel monitoring records to define sampling requirements for their inspection, and a brief review of overall plant safety procedures. Samples were taken on operators from two (2) separate shifts in each of the two (2) reactor modules, one dryer operator and a maintenance mechanic. The sampling for lead was limited to an 8-hour sample on a line III compounder during a Western Electric run. In all cases, the plant parallel-sampled the OSHA samples.

Currently, the inspectors are awaiting the results of their sampling to determine if further sampling is required. The closing conference will be scheduled following that determination.

FACTORY MUTUAL INSPECTION

Factory Mutual Engineering conducted their semi-annual inspection on May 15, 16, 1979. The fire pumps were also tested and rated satisfactory.

OSHA COMPLIANCE

Lead - Activity in this area was limited to revising the process design for the building ventilation system baghouse air supply. The new design reflects air supply pressure requirements keyed to particulate loadings which normally would be found in that stream. Also, the forms for the finalized lead sampling plan have been received and the sampling procedures have been finalized.

OSHA INSPECTION 7/25/79

- 1) Respirator Storage (in Service)
- 2) Steam leak overhead of L-I Mill has standing H₂O in area of panel
- 3) Open junction box (loose) #3 down L-I
- 4) PP 2 West of S-Turn I Entrance open base
- 5) Unidentified box W of lighting X far by Bulldog line I
- 6) Plug sockets or remove wiring L-3 bagging machine
- 7) ^{junction box} cover downstream of L-III scale 0
- 8) Chain or swing gate guard access to N-End of Elevated conveyor L-3 bagger
- 9) L-III plast. pump guard loose outside D.R.C.R.
- 10) loose receptacle NE of L-3 control room @ bldg column
- 11) " " NE of A Blunder L-3
- 12) Lighting Wiring @ feeder deck
- 13) open wiring North End L-III Chiller

14 415 Site Screen over supply cord must be replaced

- 15) Boiler House H₂O fountain plug for No Contact Cover
- 16) Main Steam Valve platform Access ladders on East Wall are 6" away

Shop

- 1) Blow off air hoses in Machine Shop area
- * Must have Reducing Nozzle (plant air pres - 62 PSI)
- 2) GFI did Not Work
- 3) Electrical Control Panel @ Tool Room blocked
- 4) Panel @ Pul's bench has exposed bus bars
- * 5) Solvent degreaser Tank - Check solvent flammability
- 6) Shop fan - Repair Cord
- 7) O₂ - C₂H₂ Cylinders - if Not Connected to gauges, they must be separated or indicated
- * 516H Not for storage - Spray Metalizing

OSHA Inspect 7/25/79 P. 3 - shop

8) Electric Welder in Shop Needs local disconnect
west wall old shop

4 checked 7/26/79 & found acceptable

9) fan New Welding Area - No dead front

10) Slinger lead to welder lead - Electric Welder New
Shop applied W/in 10 feet of Slinger & Portable

11) Steam/Soap Cleaner - No Safety Valve on Water
Side
Connection to Machine is not practical → P & H

12) Pressure test on Cutting Rig in Shop

13) I & E Shop label lighting panel North of W. door

14) a) - 10 Switchgear Area open panels & doors

b) open sided floor (East)

4 c) open panel 110/208 - Temporary feeder
No label Serious?

d) Rags & paper out of area

Vingl

- 1) 240 V. Wires to Emergency alarm kept for 24V. System behind dryer panel in VCR

7/26/79

- 1) V-11 A @ S. Stair open contact w/ loose wiring
- 2) (My Comment) RVCA Collector trans. rtr, loose
- 3) old ground N of CWS are hanging loose
- 4) D 4 & 500 Fire ext Re locate bracket
- 5) CWS/R runs during Steam Strip @ 175 °F & need P.P. Insulation
- 6) SS/EU @ incinerator - light cover is broken
- 7) have health dept Check H₂O quality of Potable Systems
- 8) Em. Equip Station fuse panel cover off

9 Maint Dock - get Chocks

Contact procedures

- Make sure you read the fine print
- A. D. King must be contacted for discussion
- if above fails, go Contact Route.

Safety Showers & Eyewash facilities

Check for supply & location

Should Wash face and eyes

Potable H₂O Check quality by sample
take several samples and request written
confirmation

Charles F. Kazienko Dennis Butler's
Supervisor

Closing Conference OSHA Inspector 7/27/79

Attendees CLM, CRM, ELK, STV, Joe Shackelford, Mr. Butler

- 1) Breaker panels in electrical cabinets Immediate
PP 2 - line I W of S. door
 - 2) Cleaning Air pressure in excess of 30 PSI static pressure
4-in Maint Shop Immediate
 - 3) 110V Control panel @ Tool room has exposed contacts
 - 5) V-10 Switchgear area ← Immediate ↗
 - 4) Electric Welders Cancelled
 - 6) Chiller bldg open electrical contacts Immediate
 - 7) New Reactor seal Charge using Cat. fork lift truck
which was defective. Immediate
 - 8) V-10 #1 & 2 dryers Trunion rollers - 15 days (calendar from date of citation)
-
- a) Get Counter weight down from 600 Series
silo structure
- b) Cl I, Sup D, Div II - ~~Bolts~~ in all housing.

Abatement dates firm

- ↳ Bill Holden - trip to check all citations
- ↳ Write letter explaining abatement method and date following field check.
- ↳ Post citation at bulletin boards w/ Joe Shackelford

Monitoring Program - JVH

VCM

LEAD

OTHERS - CEAP, CERD

Honeywell Continuous VCM Monitors

VCM COMPLIANCE PROGRAM - JVH

EVOLUTION OF TECHNIQUE

BADGE VS. GAS BAG

RESPIRATORS AHS

↳ PROGRAM

↳ CLEANING METHOD

↳ SPOT CHECK

↳ MONTHLY & WEEKLY CHECKS

↳ ANNUAL TRAINING

LEAD COMPLIANCE PROGRAM - AHS

MEDICAL SURVEILLANCE

↳ AHS 1977, 1978, 1979

↳ SHOW PROGRAM WRITE-UP

↳ MEDICAL SURVEILLANCE LOG

PROCEDURES - AHS

- PERMIT SYSTEM

- ENTRY

- LOCKOUT

- EMERGENCY PLAN

- PROCESS SAFETY REVIEWS

Conv. W/ Roy Gibbs 7/23/79

few excursions above 1.0 ppm

Must request
results in writing

Closing Conf.

better Ceiling Sampling

pt. results 0.024 Mg/m³

Antimony 0.065

Wipe Sampling - CR. deck 13 Mg/g

- Resp - 8.5 Mg/g

- Control panel 4 Mg/g

Terry Metcalf

5-81 - Ruptured disc bulging w/No Nerve inv.

→ Return to work mid-week - Can't lift 50# bags
Continuously for ever.

→ As healthy now as he ever will be.

Call Medical

Faulkner Elvin &
Son 256-8249

015 AV 16" bar good safety features
031 AV firewood C

Homelite
pioneer
stihl

02 8AV Stihl

Super E-Z Homelite

Jolly Faulkner

015 AV w/16" bar — 215 (200⁰⁰ tax & all) 2.0 CI

028 Stihl 280 (260⁰⁰ tax & all) 3.0 CI

Super E-Z Homelite 16" bar ^{list}249⁹⁵ (235⁰⁰ Cash) 3.0 CI
_{inc Tax}

XL-12 ^{list}265.00 (245⁰⁰ tax & all) 3.25 CI
_{Cash}

Terry Metcalf

7-23-79

A)

Dr. McDonald Examined following his injury (3/24/79) on late April 26, 1979. No Conclusive findings.

Dr McDonald Again examined him on 7-13-79 and scheduled Terry for Myelogram 7-20-79.

Myelogram indicated L5-S1 disc ruptured. bulged w/ no nerve involvement

H. H. Jones Conv. 7-23, 79

Handle Administratively if we don't have a job for him.

Dr McDonald said that he has seen ruptured discs ~~from~~ ⁱⁿ people who have been shoveling.

H H. Jones said that

Mr. Dennis Butler of the Federal OSHA Office in Jackson Ms arrived at the plant about 8³⁰ AM on 7/25/79 for a Safety inspection. During the opening conference, he said that he would need pictures of violations which he would cite. Other technical violations would be verbally communicated to us as we passed by but not noted formally. He further requested that a union representative accompany him during the walk-around and the closing conference could be set up jointly or separately depending upon our preference.