INDUSTRIAL HYGIENISTS CONFERENCE

ENVIRONMENTAL CONTROL DEPARTMENT

January 21 - 23, 1974

- MINUTES -

Those in attendance were:
D. A. Aldinger
F. J. Angelos
M. A. Baloga
E. J. Bulava
D. R. Christensen
L. A. Schriver
E. G. Stevens
G. L. Swallow

Guest Speakers were:
J. E. Hesse
D. E. Hillier
W. B. Reitze

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Monday, January 21, 1974

Opening Session

After opening remarks by G. L. Swallow, J. E. Hesse addressed the group. He discussed the need for a Housekeeping Reporting System in conjunction with Industrial Hygiene Surveys. He pointed out that housekeeping is relevant to Environmental Control and a good indicator of the level of performance in this area as well as other areas. He specifically mentioned, as typical examples, that the following should be observed:

a. Whether the floors are clean.
b. Whether the unacceptable practice of blowing with compressed air is being used to remove dust from equipment and floors.
c. Whether wet sweeping is being used in order to minimize generation of dust.
d. Whether asbestos bags are being conscientiously patched when required.
e. Whether dust hoods are operating properly and in good repair.
f. Whether stationary and mobile equipment are free from dust accumulations.

He emphasized that the housekeeping observations and report should be oriented toward Industrial Hygiene and Environmental Control. It should not concern itself with such "OSHA-type problems" as whether floors are properly lined in the correct color, or whether offices are neat and tidy. Photographs are to be taken. Plant people are to be counseled. Critical conditions are to be called to the attention of all people concerned, immediately.

New Organization and Policies

"In-house surveys" were discussed. The necessity for us to instruct plant people was reiterated. Denny suggested we should have some basic instruction outlines and data sheets in order that the various Industrial Hygienists cover essentially the same information with each plant and division.

It was agreed that pages for the J-M Environmental Control Department procedures book will continue to be drafted in Denver and circulated for comments.

A question was raised regarding sampling stations over 2.0 F/cc during semi-annual surveys. It was pointed out that whenever conditions warrant it, other stations can and should be sampled at the discretion of the Industrial Hygienist, regardless of the results of the previous survey.

Ed Stevens pointed out that this is particularly necessary because it has already shown that plants concentrate their efforts on stations over TLV at the expense of stations reported as being under TLV. Hence, retrogression is not uncommon.

Our reporting systems are modified in conjunction with our reorganization. However, some of the basic principles still hold. Among them is the fact that no station shall be removed from the "All Stations List" unless and until the plant manager states in writing that it is permanently discontinued.

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Some of those present felt that running as many as twelve personal sampling pumps simultaneously, as OSHA claims they do, is either infeasible or impossible. It was pointed out that several different OSHA people claim they can and do run a dozen pumps at a time. However, the objective is to get the job done, and to use the number of pumps which makes sense under the prevailing circumstances. It is admitted by all concerned that running many pumps prevents making the detailed observations which have been made in the past.

Ed Bulava stated that now more than ever, plant people are looking for specific help and guidance from Industrial Hygienists. George Swallow requested that we give such help whenever time permits. He also requested that he be informed of situations where we have the capability but not the time to give such service.

In response to a question, it was stated that samples taken on special surveys are to be counted in Denver, exactly as those for a regular survey. Results of special surveys should be entered in the Permanent Record Book whenever they apply to established stations.

Larry Schriver asked whether there was any longer a need for total high volume dust samples. It was agreed that there is not. At present we need only respirable high volume dust samples.

Denny stated that to complete transfer of equipment associated with the reorganization, he needs the flat field microscope from Manville and the Cahn balance from Manville. The microscope is needed immediately. The balance can wait until the R&D Center is set up to do quartz analysis by the Silver Membrane Method. It was also stated that all labs will probably need additional portable equipment in order to have enough to send to plants for "surveys of limited scope".

It was agreed that when equipment is sent to a plant, return dates will be specified in advance. If compliance with our dates is not good, we will get help in the form of a letter from the Vice-Presidential level.

Denny discussed information needed under our new operating procedures in order to guarantee that our reports and records are intelligible. For newly established stations, he requested that:

a. The word NEW be written on the top of the worksheet.
b. A photograph be included for the record book.
c. There be a complete station description as it will appear in the permanent record book.
d. The reason for establishing a station be given:
   1. Hygienist's discretion
   2. Plant or Division request
   3. New process or equipment
e. A statement as to whether the results at this station are to be issued as a special report and if so, to whom.

Regarding cancellation of stations he requested that:

a. Cancelled stations be listed separately.
b. The reason for cancellation be given. NOTE: all such cancelled stations are tentative until confirmed in writing by the plant manager.

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When special samples are sent in, please show the following:

a. Reason for the request
b. The person making the request
c. Report distribution
d. Complete description of the station
e. Indicate at the top of the worksheet the word SPECIAL.

Denny requested that when a station is not operating during a survey that a worksheet be made out for that station any way, with the statement "Did Not Operate".

Don Hillier joined the group at 10:15. He first mentioned that Goldfield's section has a sizeable list of unused field equipment, some of which may be useful to us. It was agreed that the list would be circulated in order that we can determine what equipment we wish to obtain.

Don stated that in his recent travels and discussions with customers, he finds there is a continuing need for sample analyzing services, expecially for asbestos counting. Hillier and Swallow will discuss this with Jack Garber.

He also found that reports to customers published by the Industrial Environmental Engineering Services group have been poorly done and have included important errors. It was agreed that Hillier and Swallow should also discuss this with Jack Garber.

Don Hillier then reiterated the Housekeeping Inspection requirements which Mr. Hesse had discussed earlier. In addition to the things covered by Mr. Hesse, Don stated that we should devise some format or checklist to minimize the writing and effort needed to make a plant housekeeping inspection. We should use pictures to help force action by the plant, but should be able to accomplish this with only a fraction of the number of pictures typical of our former housekeeping reports. He pointed out that not only the Industrial Hygienists byt also Marty Baloga, George Swallow, and he, should make housekeeping reports whenever they visit a plant. It was agreed that the report would be sent to Denver and issued to management from there.

It was pointed out that plants who make their own "in-house surveys" will be surveyed less often than the others. It is especially important that such plants be covered by visits from other personnel as mentioned above.

After Don Hillier's departure, the discussion turned to Corporate-wide equipment calibration. Denny pointed out that calibration data from every field office is needed in Denver on a regular basis. It is needed in order that we collectively know we are doing accurate work, to maintain our credibility within and outside the corporation, and to be in compliance with and to maintain our AIHA accreditation which is pending.

A series of curves showing sampling pump flow-rate vs. time, clearly indicated that there is a significant reduction in flow rate in the course of a single day's operation. All agreed that this fall-off was typical. It was agreed that further work would be done. The Denver Laboratory will get additional data and solicit data from each laboratory. With this information available, they will propose a good correction factor to be used at all locations.

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It was pointed out that any pump should be run for a few minutes after being taken off "charge" before it is calibrated. This is for the reason that there is an extremely abrubt reduction in pumping rate immediately after the batteries have been recharged. It was agreed that all the calibration work would be done on MSA Model G pumps, in the U.S. In Canada, Ed Stevens will do calibration on Casellas. It was agreed that regular pump calibration data will be supplied to the Denver Laboratory from all U.S. locations on a monthly basis.

It was agreed that standard shipping containers for use in transporting cassettes are not needed. We have had no problem with breakage to date, and because of the extreme variation in numbers of cassettes it would be inefficient to utilize a standard size container. The consensus was that certified mail has proved to be the best, safest means of shipping cassettes.

Reporting

Regarding Field Office responsibilities in our new reporting system, Larry Schriver felt that what had been published to date was clear. He had no questions or comments for discussion.

The question of impinger sampling was raised in conjunction with Denver Laboratory reporting responsibilities. It was stated that so far as silica sampling is concerned, impingers are basically phased out. They will, however, be used, simultaneously with respirable gravimetric samples at stations where, on the previous survey, the station was over TLV by the respirable gravimetric method, and under TLV by the impinger method.

It was noted in passing that impingers may also be used in the future for the sampling of certain other dusts for which the impinger is still the officially accepted method.

Larry Schriver raised the question of silica sampling at new locations. As for example, Long Beach Thermo-12. It was agreed that simultaneous impinger and respirable gravimetric sampling should be done for the initial survey at a new location.

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Reporting (Continued)

Ed Bulava noted that in conjunction with his recent field experience that certain plants were "playing games". He cited examples where the plant manager stood behind the operator during the entire sampling period, obviously insuring that the conditions were <u>not</u> typical. He also referred to certain plants stating that we could not sample a given area when we were ready because <u>they</u> weren't ready; that is to say they had not done their cosmetic housekeeping for the specific benefit of the Industrial Hygiene sampling. Ed also pointed out that it was quite obvious that plants were concentrating their efforts on certain stations to get them below TLV, even if only momentarily, and in the meantime, neglecting to maintain stations which had previously been surveyed and found below TLV.

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Denny pointed out that survey data sheets must be initialed by the Industrial Hygienist who did the sampling. It was pointed out that any and all basic Industrial Hygiene documents may at some time be required as evidence in a Federal Court action. They must, therefore, be carefully prepared and include all of the essential information indicated.

Regarding noise surveys and reporting, it was agreed that a training outline and data sheets for plant personnel should be prepared. Both Frank Angelos and Ed Bulava have already done considerable work in this area. They will exchange documents and propose a single comprehensive document to be used by all laboratories.

Marty Baloga explained the new reporting procedure developed at headquarters and being implemented by himself. It is designed to keep top management regularly informed regarding progress in correcting Industrial Hygiene problems.

Fluctuating stations were discussed. It was pointed out that fluctuations can occur for a large number of reasons, including the operator, the product, the season, condition of equipment, and general housekeeping level. Additional fluctuations can occur in a cyclic nature because of the different operations the operator must perform in the course of his regular workday. Industrial Hygienists should always be aware of the possibility of fluctuation and comment when necessary, particularly to point out whether a given sample appears to represent a maximum, minimum, or average condition. It was also pointed out that as has always been done, we must continue to sample full work cycles, in order that the results be as nearly typical and average as possible.

It was also pointed out that in the case of asbestos and other materials where ceiling limits exist, special peak samples need to be taken when a fluctuating situation exists.

The means of handling and reporting multiple samples was discussed at some length. This is a regular occurance because we normally take two asbestos samples at a station during a given survey. It was pointed out that in some instances, at a given station, one sample may be over TLV and the other under TLV. In such cases, it is necessary to decide whether the data should be used individually or averaged, and then to determine whether the station is indeed over or under TLV. It was pointed out that no single rule applies to these situations. The circumstances surrounding the survey period are extremely pertinent and should be reported as completely as feasible. The final decision on whether to report such a station as over or under TLV will be made in Denver.

It was additionally mentioned that this type of station merits careful verbal review with the plant manager at the time of the exit interview.

Swallow pointed out that DNO's (stations which did not operate during the survey) detract substantially from the usefulness of an Industrial Hygiene Survey and should be discouraged. Some division personnel are actively seeking to guarantee that plants have all operations running during a survey. We too should do everything possible to see that this is the case.

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Sampling

The sampling of maintenance workers was discussed. It was pointed out that although we have sought to sample maintenance workers doing jobs where significant asbestos exposures are suspected, we have had only modest success. It has been largely a question of minimal cooperation from plant people. Because this type of work is done only occasionally, there is no way the Industrial Hygienist can secure such samples without good cooperation from plant people. Ed Bulava stated that immediately after proding from Denver, a certain amount of cooperation existed, but rapidly fell off again. It was agreed that Swallow would check Corporate policy regarding continuation of this work, and request top-level help if such work is still wanted.

A discussion of respirable mass sampling for silica dust established that the method is apparently well established and being used without any major problems. It was noted that samples are taken with a two piece cassette using Gelman VM-1 filters (5.0 micron pore size). It was pointed out that either pour paper or metal screens can be used to back-up these filters. Some of those present felt they got better results using the paper.

It was pointed out that there is still a need for high volume sampling (respirable). However, it should not be essential to sample all high volume stations every year. Where conditions are found to be constant by checking past records and it is known that no process or raw material changes have been made, we can use high volume data from one year to the next. It was agreed however, that we must be sure not to go too long between samplings at a given location; three years at a maximum.

Ed Bulava pointed out that the reliability and credibility of respirable mass determinations is considerably improved with the use of our present electrobalances. He stated that now one of his chief problems is the reluctance of our employees to wear the respirable mass sampling monitor.

The status of silver membrane sampling for silica dust was reviewed. It is felt that since a good cost reduction is available by this means, and the Federal Government favors the method, that we should get approval to start equiping ourselves in the near future. It was pointed out that when this method becomes operable, the silver membrane samples will, themselves, take the place of high volume samples. It will be necessary for the Industrial Hygienist to designate which of the silver membranes should be analyzed by X-ray diffraction.

Because the Canadian Provincial and Federal Governments both still use the midget impinger for dust sampling, there is still considerable interest in the method at our Jeffrey Laboratory. Ed Stevens reported on some of the work they and other Canadian Laboratories have done with regard to this method. Ed Stevens' conclusions include the following:

a. So far as field work is concerned, he sees very little difference whether alcohol or water is used in the impinger.
b. The settling time in the microscope cell is slower with water; a minimum of one hour is needed. With alcohol, 35-40 minutes suffices.
c. Alcohol appears to cause or allow more agglomeration than does water.
d. Probably because of "c", above, slightly higher counts are found when water is used.
e. Counting is more difficult when water is used.

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Ed reported that McGill University is in the midst of a project aimed at attempting to equate fiber counts by the membrane filter method with impinger counts.

Special considerations in asbestos sampling were discussed at some length. Denny pointed out that he has received a number of samples which were too heavy to count. We should inspect our samples in the field and re-sample when it becomes evident that too great a concentration of dust and fiber has accumulated on the membrane filter. This type of problem has occurred particularly in the talc plants and mines.

Larry Schriver stated that a new addition of the U.S. Public Health Service Syllabus entitled "The Industrial Environment - Its Evaluation and Control" has been printed. It is said to contain much information on up-to-date sampling of asbestos, as well as other air contaminants. It was agreed that Denver should look into purchasing copies for the laboratories and field offices.

Ed Stevens reported on very substantial variations in asbestos sample counts, depending upon whether or not a plastic shield was used between the cassette and the worker's clothing. It was agreed that further work and investigation should be done on this.

Larry Schriver stated that Dr. Balzar had done some work regarding shipping of cassettes. He felt from his preliminary work that static charges may have been developed which might effect the ultimate fiber count.

Ed Stevens pointed out that some special work done at Jeffrey indicated that workers using blow-off booths often expose themselves to greater than the allowable peak asbestos concentration. Therefore, whenever blow-off booths are used, the worker should wear a suitable respirator.

The new noise sampling reporting was discussed. It was pointed out that the field forms are designed for the final evaluation of noise at a given station to be expressed in the terms of the Federal Register, namely that the "time-weighted average" formula yield a figure of more or less than 1.0. Values at or Under 1.0 indicate the station is below TLV. Values Over 1.0 are over TLV. From now on, our noise summary reports will express results in this manner. When a station is above TLV the actual number, as for example, 1.7, will be shown to give an indication of how seriously over TLV the station is. Frank Angelos and Ed Bulava will include a discussion of this Federal method of calculating and reporting noise stations in their instruction sheets to be distributed to all plants.

It was agreed that Denny will check with B&K regarding the frequency of meter calibration required at the factory, over and above the normal laboratory calibration.

Regarding Fume/Vapor sampling, Ed Bulava stated that the current ACGIH Threshold Limit Values booklet shows lower TLV's for a number of fumes and vapors. It was pointed out that we have been and will continue to use whatever values are required by Federal law. These are still the values published in the October 18, 1972, Federal Register.

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It was noted that the use of charcoal tubes for sampling solvent vapors is apparently no further developed now than it was two years ago when Ed Bulava and George Swallow visited the NIOSH laboratories in Cincinnati.

It was pointed out that fume/vapor sampling, as is the case with most other airborne contaminants, must be done on a time-weighted average basis. Thus, an operator's exposure has to be judged on his whole day's work, not, for example, solely on his brief exposure to phenol in a cold storage room. Situations such as the above should be discussed with the plant manager during the exit interview, pointing out that employees must not be allowed to remain in the exposure area long enough to approach the TLV on a time-weighted basis. At the same time, we must always check for ceiling limits where they exist, to be sure that these are never exceeded, even for brief time periods.

It was also pointed out that areas such as a cold storage room where confined fumes exceed TLV should be properly marked to indicate that it is an "exposure area".

Return air or "CDCA" samples were discussed. It was pointed out that we have already adopted the Federal regulations regarding CDCA stations which do not return the air to the work place. Therefore, the criterion is "no visible emissions". We are, however, continuing to sample and report actual fiber counts when the air is returned to the plant. Denny Christensen requested that in all samples of return air or CDCA, it be clearly indicated whether the air is or is not being returned to the work place.

It was agreed that Ed Bulava would include his return air and CDCA stations as part of his regular division survey at Manville, rather than sampling the Manville plant as a whole for return air as was formerly done.

Ed Stevens discussed the sampling of lead exposures. He felt that the Research analyses were erratic. Since we have only minimal data, it was agreed that we would examine the results from new samples just submitted, before attempting to evaluate the reliability of these analyses. Ed Stevens will send a few Millipore HA filters to other laboratories for their use in lead sampling.

Ed Stevens asked those who have the most experience, what problems, if any, present themselves in atmospheric sampling of the Thermo-12 process. Ed Bulava and Doug Aldinger both expressed the idea that there was very little problem, that respirable gravimetric sampling was standard now, and with minor exceptions, showed the process to be well within Industrial Hygiene limits. The silica content of typical dust from this process is quite low, generally in the zero to three percent range.

George Swallow expressed his disgust with the entire Heat Stress program as proposed by the Federal Government. He stated that no more heat stress sampling is to be done until further notice.

Doug Aldinger reviewed the U.S. Steel Instruction Book on Industrial Hygiene sampling. After a careful review, he has come to the conclusion that it is a good basic reference and should be a part of each Field Office and Laboratory library.

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Facilities & Equipment

There was a general discussion of the merits of the various personal sampling pumps available in the market-place. All but Ed Stevens have a marked preference for the MSA Model G pump. Ed Stevens has had better results with Casella. The problems he has had with the MSA pumps suggest that the borderline rejects are sent to Canada, while the good equipment remains in the U.S. He pointed out that pulsation dampeners are now available for the Casella pumps as is also the case with the MSA Model G.

Ed Stevens has been loaned a test instrument for evaluating Carbon Monoxide levels. He will evaluate it and report his findings. At that time, we will check with other sources and determine whether the use of such equipment warrents the purchase of one or more units. It was pointed out that our standard method of measuring CO is still the Draeger tube whose accuracy is well known to be only on the order of plus or minus 25-50%.

Frank Angelos reported upon the success of the Climet monitor installation at Waukegan. The instrument clearly shows the dust level on a continuous basis. Shake cycles are clearly discernible. A total dust count of one million particles per cubic foot closely equates to 1.0 F/cc, in its present installation. It has operated continuously for thirty days with no problems of any kind.

Frank agreed to determine whether Waukegan wanted to make a permanent installation to monitor a bag-house in conjunction with Illinois law, or whether they would be interested in loaning it to the Toronto plant where they have an extremely difficult time maintaining their Sinclair-Phoenix photometers.

All concerned discussed possible future equipment which would be either essential or helpful in making Industrial Hygiene Surveys. Ed Bulava pointed out that portable gas chromatographs are being improved and made smaller. These instruments are alleged to be a vast improvement over the conventional Draeger tube, both in determining what contaminants exist in the atmosphere, and in their accuracy of measurement.

Ed Stevens discussed the Wilks infra-red scanner which is also made in a portable model, and is said to be capable of reading 80% of the gasses and vapors on the current OSHA chart. It also produces a continuous record so that fluctuations can be readily identified.

It was agreed that Denny Christensen and George Swallow would confer with people at the R&D Center for their latest opinions on the above, plus any other equipment they may recommend.

Ed Stevens showed the Casella Flow Meter, which is basically a miniature rotameter. It was agreed that this inexpensive piece of equipment would be worthwhile having for field checking our personal monitoring pumps.

It was agreed that the list of surplus equipment published by Joe Goldfield's Department will be circulated to all laboratories.

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It was pointed out that our laboratories also have some surplus and obsolete equipment because of changing sampling and analytical methods. Each laboratory and field office was requested to check their inventory within the next few months, after which a decision would be made on what can and should be disposed of.

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Administration

Bill Reitze spoke to the group regarding his views concerning some aspects of the future of Industrial Hygiene nationally. He stated that OSHA will be getting tougher, that silica regulations will probably be more restrictive, and that more in-plant environmental testing and physical examinations will be required by future Federal laws.

He stated that the states are becoming more active in their administration of Industrial Hygiene surveillance. He noted that Johns-Manville's workmen's compensation bill for hearing loss in the state of New Jersey was $185,000 in 1973 alone.

He discussed the difference in categories of fiber glass, differentiating between the usual large diameter insulation glass and the fine diameter microfibers. He feels that only the latter could possibly become a toxic problem.

He mentioned that investigative work is being done with mineral wool fibers for the first time.

He feels that when TLV's are re-written for these materials, they will be on the basis of fiber counts.

He stated that the Bureau of Mines has recently excluded tremolite from the regular asbestos category.

1974 schedules were discussed. With the exception of the West Coast Field Office, there appeared to be no major problems.

Regarding inter-laboratory communications, it was agreed that pertinent company bulletins should be sent to all laboratories from Denver, since we find it difficult to get such information from the plants where our facilities are located. It was agreed that pertinent parts of criteria documents would be sent to all laboratory and field office locations as a matter of general interest. It should be understood that these are proposals, not laws.

Ed Stevens stated that he had access to many documents regarding asbestos which would be of interest, generally. He volunteered to send copies to the other locations.

It was stated that meeting our survey report deadlines is extremely important, in order to maintain interest in our survey results. It was requested that we do everything possible to minimize the time between the field work and the final survey report. We should not go along with plant requests to wait while they complete certain control projects before we sample. We should encourage

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the plants to operate all of their equipment during our survey so that it is complete as well as timely.

A discussion of the safety and health hazards of our own personnel revealed that we have generally all of the safety equipment considered necessary for the job. The one exception was prescription safety glasses. It was agreed that Denver would investigate company policy regarding procurement of prescription safety glasses.

We have, in the past, used personal sampling monitors on our hygienists to determine their exposure to toxic substances, particularly asbestos. The results showed exposures to be well within TLV. This practice can and should be continued on a periodic basis.

The need for personnel training was discussed, noting that Messrs. Antonson, Brower, Gittel, and VanBendegom will need to go to school for the first time.

The number of available schools is increasing. Also, it is felt that the NIOSH Cincinnati school has lowered its standards since our original group of Industrial Hygienists attended. Therefore, a listing of all known schools was made. These are:

1. A comprehensive OSHA course given in Chicago
2. The NIOSH Cincinnati course already mentioned
3. National Safety Council courses given in Chicago
4. Industrial Hygiene courses given by the Industrial Health Foundation in Pittsburgh.
5. AIHA courses which are given periodically in various locations
6. Environmental Sciences courses given at Rutgers

Tentatively it was agreed that in order to learn more about the comparative value of these courses and to minimize costs, we will investigate the following:

1. Send Will Brower to a Rutgers course
2. Send Bob VanBendegom to one of the two Chicago based courses.
3. Send Tom Antonson to the NIOSH Microscope course
4. Defer action for Roger Gittel until we have feed-back from the other three.

Ed Stevens felt that access to plant health records would help us in understanding the exposure-health experience in the plants and mines. It was decided we should again discuss the availability of these records with Bill Reitze.

A proposal for identification cards to facilitate airline travel with sampling equipment was dropped. All present stated that they no longer had trouble at airports with getting their equipment aboard the airplane.

All present were requested to see to it that their various communications are completely identified. Usual problems consist of lack of information of plant, division, date, or nature of the substance being sampled.

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Ed Stevens re-emphasized the fact that we and our people can substantially help plant and mine managers by giving suggestions and making recommendations on means and methods of correcting over TLV situations. We have a unique opportunity since we see all plants and mines and look at them from an environmental control point of view.

Swallow stated that in the near future each laboratory and field location would receive a monthly budget figure for covering small laboratory items and supplies.

Government Regulations & TLV's

It was again emphasized that with the one exception of asbestos fiber dust levels in the United States, we will use Federal Regulations and TLV's at all times. Proposed new TLV's are of interest and should be known to anticipate future needs. However, they are not to be used in our survey reports.

It was pointed out that the Federal asbestos regulations specifically require area sampling in addition to personal monitoring. All laboratories and field offices are aware of this and are setting-up such stations. All present were asked to be sure that such coverage is ample.

The EPA emissions regulations for asbestos were discussed. It was again pointed out that wherever emissions are to the out-of-doors, we will be guided by the "no visible emissions" EPA standard.

Frank Angelos briefly discussed some OSHA attitudes he has discovered in conversation with compliance officers. He said that having a written safety program and safety instruction manuals were of importance in convincing compliance officers that plant managers are on top of safety in their plants.

Miscellaneous

Ed Pulava stated that with the changing IEES organization, he was no longer sure who to contact for information regarding commercial jobs. It was agreed we would solicit an organization chart for our use.

Denny Christensen showed us his inventory of library reference books. He will circulate it to all locations. Those who need additional books should request them from Denver.

The final item was a very brief discussion of stack sampling. It was stated that we are and continue to be out of the stack sampling business. We have not even considered any such work since the Rockdale job last June and July. We must, however, continue to maintain our single stack emergency capability.

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