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PLAINTIFF'S EXHIBIT
UC-4628

UC 149-2

UNION CARBIDE

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

TO (NAME) Mr. G. Townsend
COMPANY
LOCATION BROWNSVILLE PLANT

DATE August 3, 1973

COPY TO Mr. R. C. Glock
Mr. G. M. Juneman
Mr. W. W. McManus
Mr. T. L. Rapp
Mr. L. T. Windell

SUBJECT Brownsville Plant Industrial Hygiene Visit, July 11-12, 1973

Dear Gran:

As always, my visit to the Brownsville Plant was very enjoyable. In general, environmental improvements were noted. Mr. Lee Windell requested plans for the plant Industrial Hygiene Program including objectives and frequency of analyses. The following is a list of projects:

1. Asbestos - (F. R. 1910.93a) required sampling at least each six months. This includes gaskets, filter aides, or other sources. (Texas City Lab will continue to do fiber counting).

2. Noise - Area Sound Pressure Levels - Annually, Audio-dosimetry - Daily. Work areas where audio-dosimeter readings exceed 100% need an OSHA Compliance Plan based on Engineering or Administrative control. The criteria document of NIOSH is anticipated to be adopted by DOL - namely, 90 dBA for eight hours and 85 for 16 hours to be reduced in five years to 85 dBA for eight hours and 80 for 16 hours. All new facilities and equipment would be required to meet the 85 dBA level. (Reported by Mr. H. Adrian, Chief Industrial Hygiene Programs, Texas Department of Health).

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3. Sandblasting - Respirable Silica Dust - 6 months.
Oil Mist - 3 months
Carbon Monoxide - weekly
Check breathing air pumping - weekly
(F.R. 1910-94a.6)

4. Welding Fume - A limited number of welding exhaust systems are recommended. (Mr. Frank Northcutt at Seadrift has detailed drawings of Ruemelin systems.) All MIG welders should be equipped with commercial exhausters attached to torches. Fume control should be monitored on a six month basis.

5. Spray Painting - Provide approved enclosed spray booths that will collect exhaust spray (F.R. 1910.107b (1-4)(6-10) ANSI Z 9.2-1960). Monitor painter's breathing zone for lead and zinc - 6 months.

6. Wood Shop - Provide approved guards and exhaust hoods for all woodworking machines. (F.R. 1910.213 (r)(4)

7. Heat Stress - Reference is made to your letter dated June 15, 1973. We endorse your recommendations. Dr. Joyner recommended in 1959 that "it would seem wise to limit human exposures to a maximum water temperature of 115°F." He found that "most subjects were unable to hold their hand against a surface when it reached a temperature in the range of 131 to 140°F." I question that anyone should ascend and descend the fourth level ladder every 15 minutes. Perhaps an ice-pack suit should be considered during potential long term exposures.

8. Breathing Air - Reference is made to "Safety Procedure Guideline" dated July 2, 1973 from R. E. Gracbert. I recall that "crowe-feet" type hose connectors were in use in the Sandblast Area. These should be exchanged for lock type Hansen connectors or others that are incompatible with any other system.

9. Toxic Materials - NIOSH Criteria Documents have been published recently for Benzene, Toluene, TDI, and Chronic Acid. You will wish to order them I'm sure. The new TLV for Toluene is 100 ppm.

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10. Barge Docks - Acetic Acid and Acetic Anhydride vapors should be monitored as a basis for control evaluation.

11. Brownsville was included as a part of the Gulf Coast Area Industrial Hygiene Laboratory in the Accreditation application. This is to fulfill our obligation under the 1967 Clinical Laboratories Improvement Act.

12. Budget - $2,000 was the 5% Brownsville allocation of the Gulf Coast Industrial Hygiene Budget. Brownsville trips were pledged on a four month schedule.

13. Membership in the American Industrial Hygiene Association - Since you have been active for at least two years, you are eligible. I encourage you to apply and shall be happy to write the required letter of endorsement.

14. Requests - Last but not least, requests from units and individuals will continue to occupy a large part of your Industrial Hygiene program.

This list of subjects is only a guide since the Department of Labor may change monitoring frequency with the adoption of each permanent standard.

Please contact us if there are questions or if we can be of further help.

Very truly yours,

D. E. Deese
Senior Industrial Hygienist
Gulf Coast Area

/rr

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