TF-4534

TF-5107

UNION CARBIDE

Mr. A. P. Moss

New York Office

January 6, 1964

Mr. H. E. Allspach
Mr. R. P. Barry

Texas Area Industrial Hygienist

Dear Mr. Moss:

The number of industrial hygiene problems at Brownsville (except for noise) are, as Mr. Ketchum says, minor. We do have a noise problem in the oxygen plant and in the utilities unit. At present we require employees to wear ear plugs. We plan to improve these areas and to keep a close check on the hearing ability of the people who work in them.

It is my feeling that with the purchase of an instrument to measure noise levels, we can develop a program which can be executed here. We can keep the records necessary to comply with the California law, as suggested by Mr. Ketchum.

From the standpoint of the Brownsville Plant we see little need for an industrial hygienist in the Texas area.

Very truly yours,

H B Coons

H. B. Coons

HBC:mr

PLAINTIFF'S EXHIBIT

UC-5152

DE 004992

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UNION CARBIDE INTERNAL CORRESPONDENCE

UNION CARBIDE CHEMICALS COMPANY • P O BOX 471 TEXAS CITY TEXAS

To (Name) Mr. A. P. Moss
Company 32nd Floor
Location NEW YORK OFFICE

Date January 2, 1964

Copy to Mr. R. P. Barry
Mr. H. B. Coons

Subject Texas Area Industrial Hygienist

Dear Mr. Moss:

We recognize here at Texas City the presence of many industrial hygiene problems which need solution. Certainly a full-time hygienist in the area or in the plant would be helpful in solving some of these problems.

In reading Mr. Ketcham's letter of December 17, and in recalling conversations with him and Dr. Joyner at the time of his visit in October, I am impressed with the number of problems which fall in the category of noise, heat, and ventilation. These problems exist because of decisions made at the time these facilities were engineered and designed. We have struggled to find practical solutions to these problems and I am pessimistic about finding them. Meanwhile we are getting into a sizable building program in this plant, and I am hopeful that industrial hygiene factors are being given adequate consideration in the design stage. Similarly we are doing some modernizing of existing units in which industrial hygiene factors should be considered.

If the industrial hygiene effort is to be limited, I would rather see it applied in the design stages in the Engineering and Design Departments than in the plants, and we could continue to call upon existing personnel for consultation visits as we have been doing rather than locate an industrial hygienist in this area. Even with one industrial hygienist located in the Texas area, he could be resident on only one plant of the three and must necessarily serve on a consulting basis to the other two plants.

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In summary, while I am not adverse to locating an industrial hygienist in the Texas Area, I believe that increased efforts should be made first in the design and engineering stages of both new units and units being modernized so as to prevent problems rather than solve them.

Sincerely yours,

H. E. Allspach

H. E. Allspach

HEA/dmh

DE 004995

UC 143 2

UNION CARBIDE

INTERNAL CORRESPONDENCE

UNION CARBIDE CHEMICALS COMPANY

270 PARK AVENUE, NEW YORK 17, NEW YORK

To (Name)
Company
Location

Mr. H. E. Allspach
Mr. R. P. Barry
Mr. H. B. Coons

Date: December 24, 1963

Originating Dept: Works Manager's Dept.

Answering letter date:

Copy to:

Subject: Texas Area Industrial Hygienist

Gentlemen:

The attached letter from Mr. Ketcham on the subject matter is self-explanatory. For some time he and Dr. Dernehl have been urging us to add people in this category to our plants.

I will appreciate your counsel on this matter.

Very truly yours,

APMoss/etw

Encl.

DE 004996

UNION CARBIDE

INTERNAL CORRESPONDENCE

UNION CARBIDE CHEMICALS COMPANY SOUTH CHARLESTON 3, WEST VIRGINIA

To (Name) Mr. A. P. Moss
Company 32nd Floor
Location New York Office

Date December 17, 1963
Originating Dept Research and Development
Answering letter date

Subject Texas Area Industrial Hygienist

Copy to Mr. R. M. Berg
C. U. Dernehl, M. D.
Dr. F. Johnston
Dr. J. L. Marsh

Dear Mr. Moss:

Early this Fall I spent two consecutive weeks at the three Texas Plants with the primary objective of evaluating a suspected need for greatly increased industrial hygiene services at these locations. At each plant I discussed the needs with the plant manager and outlined a course of action which included a proposal for hiring an industrial hygienist. The managers were generally cognizant of the health problems and agreed there was considerable merit in the proposal. Dr. R. E. Joyner, Medical Director of the Texas City Plant, was also consulted and is in agreement with the plan. This letter and attached memorandum summarize my conversations with the plant managers and Dr. Joyner and is a specific request for your approval for the Texas Plants to hire an experienced professional industrial hygienist who will apportion his time between the three locations. The services of this man can be expected to result in major monetary savings, to improve our medico-legal position with respect to the impairment of hearing of our employees, and to make major contributions to the solutions to many of the health problems.

After you have had an opportunity to consider this proposal and the information in this letter and memorandum, I will appreciate a chance to discuss the subject with you, as there are some aspects which warrant further clarification.

The health problems at the three plants can be divided into two broad categories; namely, (1) noise exposure and (2) other problems including compliance with state regulations for the handling of radioisotopes, ventilation problems, heat control efforts, and air contamination.

My observations and conclusions concerning the noise problems were discussed in detail with each of the plant managers. At both the Texas City and Seadrift Plants, impairment of hearing attributable to industrial noise has been demonstrated. The situation is particularly serious as impairment of hearing in some relatively young men has progressed with disturbing rapidity. The Brownsville Plant has not reported impairment

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of hearing to date, but this may be expected as the existence of a severe hazard has been defined

Very large expenditures of money may be required to cope with the noise problems at each of the three plants. Some major expenditures have already been made and some notable reductions in noise exposures have resulted. Unfortunately, these efforts to date have had to be made without a clear-cut criterion for judging how much and what kind of correction was needed. It has been especially difficult to distinguish between noise exposure reductions which should be assigned mandatory status and those which would be desirable but not necessarily essential. Accordingly, I attempted to acquaint each of the three plant managers with the provisions and general philosophy of a noise control law passed by the State of California early in 1963. This law is extremely lenient, but it does for the first time provide a basis for distinguishing between mandatory and optional corrective action. I proposed that each plant voluntarily attempt to "live with" this California law in anticipation of the time when the State of Texas would have similar legislation. The advantages to the plants and to the Chemicals Division of following this course of action are explained in the attached memorandum, Part A.

A large number of other industrial hygiene problems in the Texas area plants were identified during this two-week survey. This was not a surprise, and very little was observed that was not already known. This was, however, the first time an effort has been made to formally record the volume and variety of the problems. As expected, the largest volume of such needs occur at the Texas City Plant. A list of 45 examples existing at the Texas City Plant is included in Part B of the attached memorandum.

The rapidly growing volume of work with radioisotopes in sealed sources is worthy of special comment. The safety aspects and the procedures for compliance with Texas State regulations have been handled capably to date by plant personnel at all three locations. Experience at other locations, however, shows conclusively that the safety and compliance aspects will require the services of an industrial hygienist to sustain the somewhat routine but mandatory procedures over extended periods of time.

Ventilation problems, efforts at heat control, and air contamination problems also occur frequently and need the services of an industrial hygienist.

There is, in my opinion, no doubt but that the serious nature and the volume of health problems at the Texas area plants require the full-time services of a professional industrial hygienist. The present level of effort being made to define and correct the problems is not adequate. Provision of full-time industrial hygiene service at the Texas Plants is most logical in view of the favorable experience at the Institute and South Charleston Plants and the Technical Center, where industrial hygienists are employed by the medical departments. The demonstrated value of the service and the overwhelming volume of work requested of the industrial hygienists

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at these locations virtually assures the success of the program at the Texas Plants. The cost of the industrial hygienist's services will be negligible in comparison with the potential savings he can be expected to produce on the noise problems alone. His contributions on other problems, from which additional major savings can be expected, make the need for his work even more apparent.

The industrial hygienist should report to Dr. R. E. Joyner, Medical Director of the Texas City Plant. This would accomplish a second highly desirable objective; namely, that of providing for over-all medical supervision of the work, including review and interpretation of the results of audiometric tests being conducted at all three locations. The time and the cost of the industrial hygienist's services should be apportioned between the three plants.

An experienced industrial hygienist of the caliber needed for this assignment will be difficult to find. The definition of an industrial hygienist, as described by the American Industrial Hygiene Association, is marked on the first page of the management brochure enclosed. I urge prompt approval of this proposal so efforts can be initiated immediately to locate a qualified man. This may take a year or more to do. In the meantime I will, of course, continue to give the three Texas Plants as much personal attention as I can.

Very truly yours,

N. H. Ketcham

N. H. Ketcham
Industrial Hygiene Consultant

NHK/dww
Attachments

DE 005000