



MEMO
Chicago-Flavors

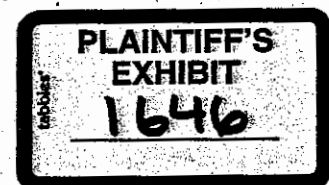
Bush Boake Allen Inc.

Date: June 29, 1995
To: G. Adams
cc: T. Samson, D. Carroll, R. Cavalli
From: Dennis Sall
Subject: **INDUSTRIAL HYGIENE RECOMMENDATIONS**

Thank you for your recent memo resulting from your June 7-8 visit to Chicago. Tim and I have reviewed your recommendations. In fact, while observing a new manufacturing process in the Kettle area, we figured out how to deal with the noise level you referenced. We will relocate the Spray Dry purge fans to an outside location, eliminating the noise source. As a result, the Kettle area will no longer need to be a hearing protected area.

We will begin to attack the list your prepared. Tim will contact you to address the items noted. Thanks.

DAS/jf
Attachments



IFF00385

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To: Dennis Sall

At: Chicago

June 21, 1995

From: Greg Adams

At: Jacksonville

cc: J. Hollyhead (E-17)
D. Carroll (Montvale)
L. Linberg (Chicago)
T. Sampson (Chicago)

RE: Industrial Hygiene Program Review

Dennis:

Please find attached , Industrial Hygiene (and Emergency Response) recommendations resulting from my June 7-8 visit. Most recommendations are ones that were identified during your last UCC audit, however there are some that relate to the transition of safety managers.

When you and Tim have time to sit down and set his goals for the remainder of the year , please have him copy me so that I can keep abreast of your I.H. program status and offer assistance. If you should have any questions please contact me.

GA

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Control Measures

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DATE

get copy

- Include LEV equipment located on Flavor Compounding mezzanine in site program.
- Establish necessary maintenance and inspection guidelines for LEV systems and include in program. Ensure that this years testing and maintenance is completed.
- Review need for LEV systems in Maintenance Shop (Welding/Burning), Battery Charging Station, Waste Solvent Satellite Station. (Exposure monitoring will help decide the need for LEV. Will be included in 1995 exposure monitoring plan)
- *LEGS*
Bring PPE Program into compliance with OSHA's recently revised PPE Standards (Division S&H will set guidelines for PPE Program.)
- Expand mandatory safety glass policy to include the warehouses where chemicals are being stored and handled. *NOT BEING DONE*
- Based on past and 1995 exposure monitoring, update RPP to reflect need (comfort/protection) for respirators. Include findings in hazard assessment section of program.
- Conduct respirator fit-testing and training for current year.
- Revise Respiratory Protection Program to comply with medical evaluation criteria in UCC Medical Procedure MM-3 and complete necessary requirements.

Copy of Plan from GJA

Asbestos

- Develop and implement an Asbestos Operation and Maintenance Program that complies with BBA/UCC corporate requirements. (GJA to help)

Exposure Monitoring

Comments Certification

- Tim Sampson to complete certification course for Industrial Hygiene Sampling. GJA to work with Tim in developing sampling game plan for the remainder of year.

Emergency Response

- Appoint Program coordinator and update site procedure.
- Ensure that the program coordinator attends ER specific training sessions at least every two years
- Update site procedure to include training requirements and ensure that all employees are trained on an annual basis.
- Post emergency phone numbers by all phones
- Review "Emergency Lighting" and "Exit" lighting and designation and install/upgrade where necessary.
- Review placement of eyewash and safety showers. Relocate/add stations as necessary.

Industrial Hygiene Program Review (Chicago)

Hearing Conservation

- Update noise survey to include areas where new equipment has been installed (Caramel and Powder Rooms).
- Ensure that compliance with Hearing Health procedures are policed and if necessary non-conformers are disciplined.
- Ensure that transferred noise exposed employees are included in the Hearing Conservation Program. Develop mechanism for documenting all testing/training associated with transfer.

Chemical Safety

- Chemical Control Program seems to have been abandoned during safety manager transition. Need to re-implement. Key points are: labeling practices; MSDS maintenance; Review of new chemicals; updating of laboratory and maintenance chemical database; procurement of MSDS's for lab and maintenance chemicals; and remove contradictory hazard statements from BEA produced MSDS's.
- Develop procedure for producing specific MSDS's for sampled material in lieu of using generic MSDS's.
- Identify MSD sheets that need to be revised to include appropriate exposure limit(s). Set timetable for completion of the necessary revisions.
- Develop procedure for updating MSD sheets and hazard labels. Update HAZCOM written program to reflect this procedure
- Ensure that Montvale sends copy of "Savannah Sheet" to Chicago upon assignment of new raw material/product. (GJA to help develop Chemical Control Guidelines for Montvale)
- Survey the plant to identify all portable and stationary containers as well as pipelines for labeling deficiencies. Address labeling deficiencies.
- Improve chemical specific training in HAZCOM program.
- Improve current site contractor's training program to include: hazardous chemicals that they may come in contact with, the location and availability of MSD sheets, the in-plant labeling system. Also, a mechanism for ensuring that the contractor has trained his employees on associated protective measures, the location and availability of MSD sheets, and the in-plant labeling system.