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Interoffice Communication

To J. A. DeBernardi

From C. E. Gremillion

Date November 18, 1974

Subject Vinyl Chloride Safety Association Trip Report

Some of the comments made do not agree with Dick Weil information given at Nov. 7 meet at VCM Ref.

The VCSA met in New Orleans October 31 through November 1, 1974 to discuss the vinyl chloride industry problems related to PVC and VCM manufacturers. Paul Fetzer and I attended the meeting.

Summary

Generally, more and more government agencies are developing regulations/standards that will put more of a burden on VC & PVC manufacturers in the years to come. DOT, EPA, Coast Guard and OSHA make up the major agencies imposing various types of requirements which we will have to live by.

First Day - October 31st

Much of the morning was spent discussing the PVC reactors, reactor safety and various methods used to vent VC from the reactors prior to personnel entry. VCM storage tanks, tank cars, tank trucks and barges were discussed relative to DOT and Coast Guard regulations recently released for comments or published as law.

J. Mudd, General Tire, commented that all employees in their PVC plant are required to wear breathing air protection in the reactors during cleaning. When asked how his employees have complied, he stated the first time they caught an employee without his breathing air protection, they gave the man 3 days off without pay and the union backed them up. Since then they have had no problems with enforcement.

Regarding DOT and Coast Guard regulations, the following were discussed by W. C. Koch of Allied Chemicals.

- 1) Hazardous Material 109 Dock - Law requires head shields on all vinyl tank cars.
- 2) Coast Guard - Published in Fed. Register, July 23, 1974 regarding vinyl chloride bulk cargo shipment.
- 3) Hazardous Material 103 Dock - Law requires hazardous information system, refers to a booklet regarding hazardous information on materials, including vinyl chloride.
- 4) Hazardous material 23 Dock - Law requires for special placarding on tank cars and trucks for vinyl chloride and other materials.
- 5) Hazardous Material 112 Dock - This law deals with the consolidation of all transportation modes (air, water & land) and correlates with HM 103. It also requires inspection of tank cars at originating points and interchanges; specific locations of VC cars in the train.
- 6) Hazardous Material 120 - Law deals with switching freight cars labeled "Dangerous" (VC cars); cars can't be cut off while in motion; no more than 4 mph allowed when connecting cars.

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A side comment resulted during this session that the railroad people will start refusing to accept VCM cars for repair unless the cars have been purged to less than 1 ppm vinyl.

Another statement that was made regarded the fact that EPA may try to form some type of Chemtrec organization of their own and eliminate the manufacturers involvement to provide technical expertise relative to train derailments, accidents, etc.

EPA proceeding status was reported by R. W. Landry, General Tire. EPA is expected to come out with both emission and performance standards on vinyl chloride probably within six (6) months. EPA is having difficulty how to enforce the standards they come out with on the companies. Fence line monitoring will be performed. EPA is also leaning toward the material balancing approach for a performance standard. EPA is attempting to get the best plans and designs from the various plants. This data is being collected and may be reflected in the standards.

EPA is planning to go to each PVC plant and obtain a list of the companies they do business with. The intent is to obtain the names of the companies so they can trace PVC usage down to the consumer.

Second Day - November 1, 1974

This entire session was presented by Mr. J. Barr - Air Products

- 1) The legal position of the SPI and industry's stay of the VCM standards is probably that a hearing will be held before December 28, 1974. A stay will not be submitted by SPI at this time. To do so would require more time for the OSHA lawyers to respond to the questions. The hearing will be held in the 2nd district court of N.Y.
- 2) Monitoring
 - a. Initially, everyone must monitor their employees. If you are at or below the action level (.5ppm TWA for 8 hours) for 2 consecutive measurements over 5 working days, no further monitoring is required. Then the only requirement you must comply with is training.
 - b. You do not have to use personnel monitoring if you are convinced and the data supports your convictions that continuous monitoring is adequate. However, the burden of proof is on you and remember OSHA will be doing personnel monitoring when they visit your plant. A vote was taken and at least 99% of the companies represented stated they would continue to use personnel monitoring.
 - c. Contrary to the statement in the standards that the method of accuracy is defined in the referenced NIOSH standard, no such methods exist. Mr. Barr suggested if interpretations of the accuracy is required, you should contact Mr. Barry Whit Assoc. Asst. Sec. for Regions, D L, OSHA, PH. (513) 684-2723, RM. 830, 1726 M N.W., Washington, D.C. 20210.
 - d. Medical surveillance is required above the action level (0.5 ppm TWA for 8 hours)

3) Regulated Area

The regulated area should not be regarded as something permanent. It may and should change as time goes on. You may establish a temporary regulated area.

4) Methods of Compliance

The written plans OSHA refers to in (f) (3) implies that each employee in the plant must have been given a copy of the plan and you may require him to sign a form stating he has received such copy. This also applies to the record requirements and notifications of employee exposure above the 1 ppm TWA for 8 hours.

5) Respiratory Protection

- a. Only the self-contained breathing apparatus is now approved both by NIOSH & Bureau of Mines.
- b. The requirements are vague and don't answer such questions as how you're going to switch types of respirators when you are in the regulated area and the concentration goes from 10 ppm to over 25 ppm. Do you come out of the regulated area before switching? Do you hold your breath and change masks, etc.?

6) Hazardous Operations

- a. OSHA has agreed any VC concentration above 100 ppm is considered an emergency and will require a written operational plan. Also they feel this level is immediately dangerous to life.
- b. Air Products will use discretion regarding the providing and change of clothing. If an employee works in a PVC reactor cleaning the reactor, a new change of clothing will be provided the next day. However, if he is just monitoring gauges, pressures, flow in the building and not in direct contact of liquid VC no change of clothing will be provided.

7) Training - Skipped - Statements straight forward

8) Medical Surveillance

- a. Plant or company doctor will have to determine what is appropriate medical surveillance is for man exposed to a VC emergency.
- b. What if an employee fails the medical exam or tests - again the doctor must make this decision what action is appropriate.
- c. After the employee leaves the company or retires, Mr. Barr is not so sure the company is not obligated to annually make the physical exams, etc. available to the former employee at cost to him.

9) Signs and Labels

- a. The word contaminated used in (e) (3) shall be interpreted above the permissible limit.
- b. Signs and labels are required on all tanks, vessels, tank cars, trucks, sample bombs, etc. containing VC. General Tire, Joe Mudd, PVC plant in OHIO is making signs 10" x 14" - 1/2 in. letters for all vessels, columns etc, gummed labels for smaller containers such as bombs, etc., size 3" x 4"; bags of resin they use stamp, size 2 1/2 x 3 "; will eventually get bags with words imprinted as part of bag.

10) Records

- a. para. (m) Mr. Barr can't think of where records maintained are not revelant.
- b. Barr feels all plants will eventually going into the microfish business to record and keep all the data for 30 years.
- c. Barr's interpretation is each employee must have his individual records; monitoring, regulated area, training, medical surveillance, etc.

11) J. Mudd, General Tire commented that Mr. D. Boyd, Director of Office of Stds. Development OSHA, interpretation of para. (g) (1) was that if the OSHA inspector were to find VC exposure to be less than 25 ppm but greater than 1 ppm TWA, the company would be cited regardless if the employees had refused to wear the proper respiratory protection or not. Mr. Bob Frantz, Union Carbide, was elected the new Vinyl Chloride Safety Association (VCSA) President & program chairman, Mr. Amos Dixon, Goodyear, was elected Vice President.

Earl Gremillion

C. E. Gremillion
Safety Director

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CC:

M. Smith - Saddle Brook
R. G. Weiss - Ponca City
F. Willson - Aberdeen
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