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FROM	P. M. Zakriski and O. S. Kurtz	FIELD POINT OR DEPT. & BLDG. NO. Brecksville R&D Center, D/8506		3095 DATE THIS LETTER 8/9/79
SUBJECT	acc			

OSHA Related Chemical Analyses at ALGCP

Chemical analyses relating to OSHA regulations are generally personnel monitoring tests. These are conducted by the staff of the general chemical laboratory for vinyl chloride (VCM) and methylene diisocyanate (MDI). There is additional testing performed by process monitors, installed to measure the work room concentration of vinyl chloride. We find the testing being performed according to good laboratory procedure.

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The general chemical laboratory is divided into several sections. One of these sections consists of several units. The unit which conducts all of the VCM analyses required by OSHA and EPA is supervised by Mr. Carl Yockey. His unit is organized well and operates very smoothly. The chemical analyses conducted there follow good laboratory practice. The instruments are properly and timely calibrated. Instrument and operator performance is checked and charted daily. Samples are clearly identified and data is accurately referenced to the proper samples. Measurements are made, recorded, computed to the environmental concentration, transmitted and filed in a careful and speedy fashion.

Mr. B. J. Chrisp's section consists of Mr. Yockey's unit and several others. Another unit performs the MDI sampling. The MDI work began in early 1979 and is not as organized as the VCM operation. It can best be described as a development program. There are only two suggestions we would make. First, calibration should be performed every day of testing and should bracket the concentrations reported. The colorimetric test used is the prescribed procedure but it does suffer from drift and interference. Daily calibration controls these potential problems. Secondly, the operation should include the periodic analysis of spiked samples. This would be an excellent control test.

The process monitors that measure workroom concentration of vinyl chloride are maintained and calibrated by the maintenance department. These analyzers receive frequent attention for routine maintenance and prompt attention for operational problems. Although weekly calibrations are performed, we suggest a more frequent calibration schedule. We note that the performance record for each monitor is kept on a card file in the maintenance shop. This record needs to be reported and reviewed by laboratory analysts. We recommend that a procedure be established to

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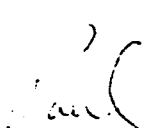
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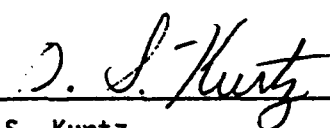
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record and monitor the response factor and calibration measurements for all process monitors performing OSHA work. It is important that a unit of the lab, like Mr. Yockey's unit review this calibration and response factor data.

In summary, we are very pleased with the laboratory operations relating to OSHA chemical analyses.



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