M I N U T E S

VINYL CHLORIDE SAFETY ASSOCIATION MEETING

Cleveland, Ohio

May 24, 1974

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M I N U T E S

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GENERAL

Attendance at this meeting was lower than previous meetings. There were 24 of the 37 member companies represented. Total attendance was about 47 people. It was agreed that the roster of companies would be called and each company would be asked to state their opinions on the proposed permanent OSHA standards. The following is a summary of comments made by each individual company.

SECTION I

PVC Producers

General Tire, J. R. Mudd

They could not live with the ceiling value maximum. They could live with a 20 ppm TWA maximum. They plan to make a presentation to the Department of Labor and will assist the SPI and other agencies in their presentations. Presently, they have 14 to 16 ppm vinyl chloride levels in polymer production areas and a 4 to 6 ppm level in the finishing area.

Air Products, J. T. Barr

They plan to raise objection to the proposed permanent standard. They have requested a hearing. John feels it would hold much weight if we could get all our customers to say something in behalf of the industry. One of the comments that Air Products is going to make is that the proposed standard is not necessary. They will also say that the standard is not feasible, and support this with facts. They will document where the levels have been and what they can achieve and what length of time will be required. They will use the precedent in the asbestos industry to base their case for vinyl chloride on and feel it is not fair that vinyl chloride should be more strict than the asbestos regulations were. Air Products plans to follow the defined five legal procedures so that they will have an entry into the courts if required at a later date. They cannot live with a ceiling value and will ask for a time weighted average. They do not like the full-face or self-contained breathing apparatus, the impervious suits, and disagree with the

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section on maintaining records and supplying data to the employees.

Presently Air Products is operating into the 20-25 time weighted average range. They wear respirators in reactors while cleaning. They feel the new standard should be 25 TWA. John proposed that a ceiling value of 40 ppm should not be exceeded for more than 15 minutes. This would really be an excursion limit rather than a ceiling limit. Air Products plans to use fixed-type instrumentations and are presently using gas chromatography, and do not feel that the standard should be based entirely on personnel monitoring. They would accept a lower TWA at some time in the future, possibly in three to four years. They will ask for exemption of PVC products that contain less than 0.10 percent by weight of vinyl chloride monomer. He indicated the desire to exchange drafts for changes to the standards with other companies. (We have given them a copy of our temporary draft and John will send us a copy of theirs.)

Borden Chemical, Leominister, Massachusetts

They have had a visit from OSHA on the 20th of May. The OSHA representatives spent approximately three and one-half hours in their plant. They took plant air measurements related to ventilation. They said they will be back in two or three weeks for more detailed surveys.

American Chemical, H. E. Kling

They are consulting with Stauffer and will cooperate with Stauffer on a presentation to OSHA. They have had low readings -- .2 to .3 ppm for a ten-minute sampling period. They get values of 16.8 ppm opening up polys. They have done some eight-hour area monitoring. They got a level of .27 ppm in the office building with the wind direction from the B. F. Goodrich plant. In discussion with Harold later, he has run some Long Beach samples on his chromatograph, and we agreed that they will work with our Long Beach personnel in developing an area monitoring plan. Initially, they will be able to run the samples in their chromatograph at Long Beach. American Chemical has been inspected by Cal OSHA.

Borden Chemical

No positive program developed for reply to OSHA yet. They have had an EPA inspection and sampled 3 1/2 miles from the plant site. They checked the water effluent, in addition to the air. In perimeter of measurements around their plant, they have found one part per million of vinyl chloride using both the charcoal trap and the tedlar bag. In the finishing area they normally get about 4 ppm vinyl chloride. In the polymer production area they get in the range of 10-25 ppm. Borden has been inspected by OSHA.

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Certain-Teed Products

They have talked to their French principals and also English companies who are operating mass polymerization plants, and will formulate an opinion to reply to OSHA. They could live with a time weighted average of 25 ppm, but feel a 50 ppm for excursion max. would not be possible.

Conoco Chemicals

The Oklahoma City plant could meet a TWA of 10 ppm with a ceiling value of 25. However, the Mississippi plant could not meet these values, but could possibly meet a 25 ppm TWA with a 40 ppm ceiling value. They also feel that an allowance should be made for excursions over the ceiling value for certain periods of time. Residual vinyl chloride content in pipe resin produced at Oklahoma City is about 300 ppm.

Diamond Shamrock

They have formed a task force to draft a reply to the standard. At Delaware City they could live with a TWA of 25 maximum. On May 16 and 17 OSHA inspected their Texas City plant.

Ethyl Corporation

They plan to get some outside help from Europe, ICI, Huls, and Solvay in answering the proposed permanent standard. They cannot meet a 50 ppm ceiling, but they can meet a 25 TWA. In their vinyl polymerization plants they have high values in the poly floor.

Firestone, W. W. Madden

They plan to make a presentation to OSHA and will supply data to SPI. They are getting engineering estimates on the amount of capital required to get to 25, 10, and 0 ppm time weighted averages. They cannot operate at 0. OSHA visited their plant last week and looked at their records and talked to some of their labor people. Currently, they have 25-30 ppm TWA in their polymerization areas, while the finishing areas have values of 3-4 ppm.

Georgia Pacific

Their plant is still under construction at Plaquemine, Louisiana. It will start up, hopefully, in the last quarter of 1974. They feel they cannot live with the ceiling value and will talk to Wacker regarding what they should propose to OSHA.

B. F. Goodrich

Herm Waltemate made a summary of our objections to the proposed permanent standards.

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Goodyear, M. Trowbridge

They feel they could live with a 25 TWA and a 50 ceiling, and plan to make a presentation to OSHA. Their program is in the formulative stages. They also favor a ceiling value with a short-time overrun. Their union people are in sympathy with the situation at the plant, but they must go along with the labor movement to support zero as a desirable standard. Operators at the plant have been exposed to levels of 10, 20, and 30 ppm TWA.

Great American Chemical

The work practices section would shut their operation down. They could not live with the definitions. They get values of 100 to 200 ppm around pumps. They cannot live with 40 for personnel monitoring. Excursion levels can be over 100 ppm.

Hooker Chemical

They will object through SPI and also directly to OSHA. They feel they can live with 25 TWA and excursions of over 50 ppm. They have had two OSHA inspections. Most work areas are under 10 ppm.

Imperial Oil (Exxon), Ontario, Canada

They are not under OSHA standards but will try to operate in the 5 to 15 TWA level. They expect they will get the same type of program from the Ontario Department of Labor by year end.

Keysor-Century, Saugus, California

They will formulate a written objection. They have no data on TWA or no ceiling measurements. They think they could live with a TWA of 25 to 30 ppm. Financially, they could not comply with the proposed standard.

Pantasote Company

They plan to follow the Tenneco proposal, and could live with a 25 TWA value. They have obtained values of over 50 when opening reactors, in which case respirators are worn.

Robin Tech

In their universal plant at Painesville they had an OSHA visit on May 6th. They have not decided how they are going to answer the standard.

Stauffer Chemical, R. A. Asti

They currently have four task forces in work preparing answers to the proposed permanent standard. They feel they can live with a 25 TWA and a 50 ppm ceiling max. They have had no OSHA inspections but have had an EPA inspection this week.

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Ray mentioned the creditability gap between Stauffer top management and plant management concerning the difficulty of meeting the proposed standard. He feels that the top management of the company are actually too optimistic about the ability of their plants to meet strict requirements.

They are currently using air masks for opening reactors. He mentioned that a company in Wellington, Delaware, is working on a badge-type indicator for personnel monitoring.

Tenneco, P. L. Bogart

Pete indicated that the State Director of work place standards for New Jersey wants to appear as a friend of the industry, and he is concerned that too strict standards would result in the plants being shut down. Tenneco can live with a 25 TWA and propose this being on a weekly basis rather than on an 8-hour basis. They also can live with a 40 ceiling. Pete indicated that their values in polymerization areas are about the same as other companies except they have found that their foremen have their highest exposures as indicated by personnel monitoring equipment (possibly this is because they are always in the areas where the problems are). They do have excursions at their bagging areas where they have had some ventilation problems. They have problems with high concentrations in the resins. They are doing physicals now on everyone and finding some abnormalities, but do not know exactly how these will be handled. They plan to make an individual presentation to OSHA and will also cooperate with the SPI.

Union Carbide

In their Texas outdoor plant they have values of 0, 2, 3, and 5 TWA with excursions of 400 to 500 ppm at ground level. They feel they can live with a TWA of 25 to 30 ppm with a 50 ppm ceiling, but some relief in terms of time the ceiling could be exceeded for special excursions. Residual vinyl in product is of concern and they feel 0.10 would be a reasonable value. They are doing some monitoring in their customer plants, and have done many physical exams on their employees.

Uniroyal

They have task force groups set up and they will make an individual presentation to OSHA in addition to the information for SPI. They are concerned about the residual vinyl level in finished products since it deteriorates with time and shipping conditions. They can live with a time weighted average of 25 to 30 ppm. NIOSH visited their plant in March.

ICI, England

The English have not yet set up any standards. If a standard of 0 ppm were set up then it would shut down the industry. They could live with

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a TWA value of 10 for their newest plants. Older plants would require 20 to 30 ppm. They have seen several hundred ppm on occasion. Their present target is 25 ppm, and they are having their Engineering Department cost out the capital required to get to that value. They feel that if they had to get below 10 ppm a new plant design would have to be required. In the drying areas, they see values of 15 ppm with peaks to several hundred.

SECTION II

VCl Monomer Producers

The next section is the comments of the vinyl chloride monomer producers and the levels they feel they could live with.

Allied

They will use the SPI position and not submit a separate statement. In the operating areas they have values of 4 to 10 with the Century OVA. Tank car loading in areas have values of 20 to 30 ppm. They had an OSHA inspection on May 16, 1974.

Connoco

A 10 ppm TWA would be acceptable. They have had no OSHA inspections.

Dow, Ed Ringwater

He was reporting on the basis of their Freeport, Texas, plant. They do daily monitoring of personnel, and are now starting area monitoring in their plant with fixed instruments and they are finding problems in the loading and sampling areas. They feel they can live with the following values and time schedule:

25 ppm TWA by July, 1975
10 ppm TWA by July, 1976
5 ppm TWA by July, 1977
2 ppm TWA by July, 1978

Ceiling Value of 50 ppm max.

Levels are currently in the range of 5 to 10 ppm TWA in their Texas plants.

A brief discussion was held at this point concerning the desirability of establishing rigid time goals to meet various TWA levels. Most companies disagree with setting time goals to reach certain targets. One example was the automotive industry and their inability to meet EPA time goals.

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Ethyl, Plants in Houston, Texas and Baton Rouge, Louisiana

They have had some samples in excess of 50 ppm TWA at the beginning but have now reduced these to 9 ppm. Some of the levels in the monomer plant were higher than values in the polymer plant.

PPG

Exposure levels below 10 ppm TWA.

SECTION III

1. Bob Dostal from Dow in Midland indicated that with their fixed analysis system they get 100 to 150 ppm levels on occasion. This data from their fixed analytical system then goes into the computer and in combination with work survey to print out time weighted averages. Typical averages for polymerization area is 2 to 6 ppm with a 3 ppm in the finishing area. They do check their fixed instrumentation with personnel monitoring using carbon tubes, and in most cases they get values under 5 ppm.

2. Six companies indicated they now have or are planning fixed point analytical systems for vinyl chloride monitoring.

3. Air Products is using half-face masks with continuous flow. The air is being supplied from compressors. Only two companies reported that they are not using any face masks or respirators in the plant. Uniroyal likes the full-face masks for cleaning reactors, but General likes the half-face masks. The standard should allow either the full-face or the half-face continuous flow masks.

4. General Tire has now installed a laundry facility in their plant. Four other companies have done likewise and feel their clothes must be decontaminated anyway if they were sent out to a commercial laundry.

5. About half the companies represented are using masks for connecting and disconnecting vinyl chloride cars.

6. Three companies reported venting vinyl chloride monomers to a flare stack. At American Chemical they actually burn vinyl chloride in their waste heat boiler. The insuing HCl is then neutralized by scrubbing.

7. Dow and four other companies had several people refuse to be medically tested. Three companies have not yet started a medical surveillance program. Four companies have removed people from PVC operating areas. General Tire indicated they will provide medical data to the individual

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personal physician, but will not give their records directly to the individual. They plan to keep these records for 20 years or as long as the man remains in their employment. After that time they will be sent to a federal registry. Five companies indicated they are using the bag method for personnel monitoring.

G. D. Schaaf

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