

Interoffice Communication

To Steve Ashby
From Tom Grumbles
Date April 22, 1981
Subject DEREGULATION OF REGULATED AREAS

As we have discussed below are the factors to be considered in deregulating areas.

1. Personnel monitoring on operators with job duties in the areas of concern.
2. Operator duties in the designated area
 - a. time spent in area
 - b. duties performed in the area
 - c. other time necessary in the area for non-specific duties.
3. Area monitoring for designated area.
4. Changes in equipment, processes, etc. in the area related to the presence and control of the chemical or agents of concern.
5. Proximity of the area to other potential sources.

Enclosed are several examples of the deregulation process accomplished at the VCM plant. These serve as a good example for the way a combination of the above factors should be used. Once you have gathered the available data we can discuss further the written determination. Let me know if you need further information at this time.


Thomas G. Grumbles

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Enclosure