

Date 26 August 1974To Mr. A. K. McMillan/Valley Forge Subject OSHA INSPECTION - CALVERT CITYFrom J. D. Kramer/Calvert City

☐ Take Action	☐ For Your Approval	☐ For Your Info	☐ Discuss With Me
☐ For Your Comments	☐ As Requested	☐ File	☐ Note & Return

The plant was visited on 20 August 1974 by Mr. Gene Woods, Compliance Officer out of the Louisville office of OSHA. Mr. Woods is a chemical engineer and seemed knowledgeable on PVC production. He had been at the B. F. Goodrich plant at Louisville. He was accompanied (not at our plant) by a maritime compliance officer who visited other dock facilities in the area, but not ours. He told us at the outset that his only interest at the present time was in vinyl chloride and our compliance with the temporary standard.

Mr. Herbig first reviewed the necessary statistics, address, medical records, etc. We then had a session with Mr. Stermon and myself on monitoring methods, record keeping, etc. Then Mr. Speed joined us and we reviewed the many and costly measures taken in the plant to reduce exposure to VCM. He then expressed a desire to meet with Mr. Sanford Beck, Union President, whom we could not locate at the time. Mr. Herbig took Mr. Woods to lunch and Mr. Beck was available upon their return.

After spending about an hour in private with Mr. Beck, Mr. Woods was taken into the plant. He first went to the Emulsion plant and was accompanied in a brief tour by Mr. Beck and Mr. Zorman. According to Mr. Zorman, the tour was brief and he was interested in whether the reactor was entered for cleaning after vinyl chloride batches. Mr. Zorman's answer was no, that we employed chemical cleaning. Since the plant was finishing an A-728 run, he took no samples and proceeded to the PVC plant.

Mr. Speed's report on his visit to the PVC plant is appended as Exhibit I. He took about 20 minute samples on six (6) operators, two being duplicates. Mr. Speed's report also indicates that the Bendix readings were quite low with the exception of point No. 1 in the exhaust fan by the reciprocating recovery compressors. As I discussed with you by telephone, we should have by the time this report is typed a total of 20 relocated points on two chromatographs in the polymerization building.

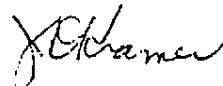
We had a "wrap up" session with Mr. Woods with Mr. Beck also in attendance after I returned from taking you, Mr. Carey, and your party to the airport. As a minor point, Mr. Woods pointed out that Mr. O'Daniel, our maintenance leak patrolman, did not have a fresh air mask with him at the time. His main concern was with

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our personnel monitoring system, and we will probably be cited on three counts in the temporary standard - 1910.93q (c)(1), (2), (3). A copy of the page from FR 39 No. 67, April 5, 1974, is attached for easy reference as Exhibit II. As to the date of April 5, 1974, we informed Mr. Woods that we had only received the Sipin pumps we felt were required the previous week. Mr. Woods gave us his interpretation of the standard with respect to frequency and method. He requested that 75% of the people on each shift be tested once per week with at least two (2) samples per person. Sample times are to be 20-30 minutes. We described a program whereby 75% (9 people) on the day shift would be sampled twice or three times for 20-30 minutes on Monday, 26 August. The same samples would be repeated on Tuesday for the afternoon shift and on Wednesday for the midnight shift. The rest of the week would be spent analyzing the 54 to 81 samples taken. This is to be repeated each week for three weeks and if all samples are below 50 ppm, the frequency can be reduced to once per month rather than weekly. He indicated that this would comply with the temporary standard and requested that we submit a progress report about 1 September. We agreed to do this. He, of course, pointed out that we would have 15 working days or 3 weeks to contest the probable citation. He told us that unless the results of their samples are above 50 ppm, we will not get the results unless we request them. I will request them.


J. D. KRAMER

JDK:s1

cc: A. R. Adams/Valley Forge
J. T. Barr/Valley Forge
T. L. Carey/Valley Forge
T. W. Herbig
R. B. Jones/Pensacola
R. W. McGinnis
E. A. Primeau/Pensacola
J. T. Sebastianelli/Valley Forge
G. B. H. Speed
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