

Interoffice Communication

To Jerald Uptain

✓ From Owen Tubb

Date February 18, 1976

Subject ABERDEEN PLANT PERSONNEL MONITORING PROGRAM PROPOSAL

Outlined below is the Personnel Monitoring Program proposed for the Aberdeen Plant as of March 1, 1976.

I. Scope and Purpose

The purpose of the Personnel Monitoring Program is to determine the level of vinyl chloride exposure to all plant personnel and to use the monitoring data to define problem areas so that corrective action can be taken to reduce employee exposure to vinyl chloride. The program complies with the OSHA regulations concerning the monitoring of vinyl chloride.

II. Monitoring Scheme

A. Eight Hour (TWA) Monitoring

Eight hour (TWA) personnel monitoring is divided into three groups as follows:

1. Employees Exposed to Less Than 0.5 ppm VCM

a. Based on Results to Date

Monitoring to be discontinued on all job classifications which have historically shown exposures for classifications to be significantly less than 0.5 ppm.

b. Based on Future Monitoring Results

Monitoring of employees exposed to less than 0.5 ppm will be discontinued after six consecutive months of determinations have been shown to be at or below the action level.

2. Employees Exposed to More Than 0.5 ppm VCM, But Less Than 1.0 ppm VCM

Employees in this group will be monitored on a quarterly basis, per job classification, per shift. If the monitoring results of any given employee exceeds the

permissible limit (1 ppm), that employee will be monitored the following months until such time that the monitoring results are shown to be at or below the permissible limit. The monitoring schedule for that employee will then revert to a quarterly basis.

3. Employees Exposed to More Than 1.0 ppm VCM

Employees in this group will be monitored once a month, per job classification, per shift.

B. Fifteen Minute Monitoring

The operating department heads have developed a list of potential hazardous operation jobs in the plant. The Safety Department will conduct fifteen (15) minute monitoring on each of the defined jobs. When it has been determined that enough sampling data has been collected, the results will be evaluated to determine whether the jobs should be classified as hazardous or not. At that time the monitoring will be discontinued.

III. Monitoring Equipment

- A. The monitoring equipment will consist of Sipin Air Collecting Pumps (Model SP-2P) and seven-liter gas bags which are obtained from Calibrated Instruments, Inc.
- B. The analytical equipment consists of a Hewlett - Packard 5710-A Gas Chromatograph which is located in the laboratory.

IV. Monitoring Schedule

See attachment for the VCM Personnel Monitoring Schedule.

V. Records

A. VCM Personnel Monitoring Daily Report

- 1. This form is a multi-purpose form which is used as follows:
 - (a) A schedule, filled out by the Safety Department, notifying employees that are to be monitored on a given date.
 - (b) Placed at Guard House to record sample bag numbers, duration of monitoring, and whether employees wear respirators or not.
 - (c) Sent to the Laboratory so that the VCM monitoring results can be entered.
 - (d) Returned to Safety Department and filed as a permanent personnel monitoring record.

(e) Used to notify employees of over-exposure. (See Section IV. B.)

(f) Used by the Safety Department to produce weekly and monthly personnel monitoring summaries.

B. Over-Exposure File

After it has been determined that an employee has been over-exposed, a copy of the VCM Personnel Monitoring Daily Report will be sent to the affected employee's Department Head. The Department Head will determine the cause of the over-exposure and write the explanation on the back of the sheet. The Department Head will also require the employee to sign the sheet. This will serve as a record of employee notification of over-exposure. The form is then sent back to the Safety Department for filing.

C. Fifteen Minute Personnel Monitoring Report

This form is to be used when conducting fifteen minute VCM monitoring. It serves the same purpose as the VCM Personnel Monitoring Daily Report, except that it will not be used to schedule employees for monitoring.

D. Employee Summary

The Employee Summary is a summary composed of individual employee monitoring data sheets which are grouped by job classifications. Also included in the summary is one data summary sheet for each job classification. Data recorded on this sheet includes names of employees in that job classification, the shift to which they are assigned, and the employee individual monitoring results, by month. This sheet will be used by the Safety Department to schedule employees for personnel monitoring. The summary will also serve as a record of each employee's monitoring results. It will be available to all employees who might wish to review their personal monitoring results.

VI. Responsibilities

A. Safety Department

The Safety Department has the following responsibilities:

1. Scheduling employees for monitoring.
2. Repair and maintenance of monitoring equipment.
3. Recording and filing of monitoring results.
4. Conducting fifteen (15) minute monitoring.

- A
5. Delivering sample bags to Laboratory.
 6. Insuring that employees are notified of over-exposures.
 7. Supervising the overall personnel monitoring program.

B. Laboratory

The Laboratory is responsible for:

1. Analyzing the air bags on a daily basis (except on weekends).
2. Recording the monitoring results.
3. Returning the completed data sheets to the Safety Department.
4. "Cleaning" the air bags and returning them to the Safety Department.
5. Repair and maintenance of the gas chromatograph.

C. Departments

Each department is responsible for:

1. Insuring that employees wear the monitoring equipment correctly and as scheduled.
2. Insuring that over-exposed employees sign the VCM Personnel Monitoring Report and for returning the signed sheets to the Safety Department.
3. Notifying the Safety Department when to conduct fifteen (15) minute monitoring, upon request from the Safety Department.

Owen Tubb

Owen Tubb
Industrial Hygienist

smp

Attachments

c: RAD, GGD, RWS, JVU, FJS, DEM, JWH, KNC, DML, RFH, LDH

VCM PERSONNEL MONITORING SCHEDULE

ABERDEEN PLANT

DEPARTMENT

PERSONNEL MONITORING SCHEDULE

Large Reactor:

1. Supervisors

Monthly, per job classification, per shift

2. Lead Operators

Quarterly, per job classification, per shift

3. Operators

Monthly, per job classification, per shift

Vinyl Dryers

Quarterly, per job classification, per shift;
Except Vinyl Baggers which will be monitored
monthly, per job classification, per shift

Compound

Quarterly, per job classification, per shift

Transportation
(East Warehouse)

Monthly, per job classification

Yard

Monthly, per job classification, per shift

Receiving Warehouse

Quarterly, per job classification, per shift

Laboratory

Quarterly, per job classification, per shift

Safety

Quarterly, per job classification

Main Office

Quarterly, per job classification

Accounting Offices

Quarterly, per job classification

Maintenance

Quarterly, per job classification, per shift

Stockroom/Shop

Discontinue monitoring

Plasticizer

Discontinue monitoring

VCM PERSONNEL MONITORING DAILY REPORT

DATE: _____

[illegible]

***NOTE: PLEASE RETURN TO DEPARTMENT HEAD IMMEDIATELY AFTER SIGNING.**

~~VAB:0001128010~~