

44 AMB
santo

Springfield, Mass.

cc:

DATE May 15, 1974

SUBJECT VCM Health Issue Status Report

REFERENCE

TO PVC Personnel

On April 5, 1974, the Occupational Safety and Health Administration (OSHA) released a temporary standard limiting exposure to VCM to 50 ppm. We have made procedural and engineering changes in the area in order to protect employees from exposure. Based on our limited test data so far, we are in compliance with the 50 ppm limit. Additional engineering changes are underway that will provide further reductions of VCM levels in the workplace and an expanded personnel monitoring system is being set up.

OSHA plans to replace the temporary standard with a permanent standard as soon as possible and by law they must do it no later than six months from the date the temporary standard is issued.

On Friday, May 10, OSHA released a copy of a proposed permanent standard. A key feature of the standard is zero exposure to VCM. At present with our existing facilities, the only known way for Monsanto to meet this proposed requirement would be by the use of full time air breathing equipment and protective clothing for all employees in the Vinyl area.

All of our active Vinyl employees have been given medical screening and those laid off employees who have had significant VCM exposure are scheduled for screening. No cases of liver cancer have been discovered to date.

While it is clear that exposure to VCM must be strictly limited, we have serious questions as to whether the proposed requirement for zero exposure is a valid standard. Obviously, we are hopeful that the continuing investigations will discover that a more realistic standard can be established which will protect the health of Vinyl employees. We will be following investigations intensively and cooperating with the Government authorities to ensure that as a first priority, worker health is protected.

Further information on the standards will be communicated as the standards are developed.

B.L.B.

R. L. Bourget

RSV 0020216

RLB/SBN

R. L. Bourget

cc

October 2, 1974

SUBJECT Permanent VCM Exposure Standard

REFERENCE

0 All PVC Personnel

On October 1, 1974, the Occupational Safety and Health Administration (OSHA) announced its permanent standard limiting worker exposure to VCM. As you know, industry has been operating under an emergency standard of 50 parts per million (ppm) maximum exposure since April, 1974. The new standard reduces this limit to 1 ppm average over an 8 hour period. Absolute exposures are limited to no more than 5 ppm for 15 minutes. These new standards will be effective on January 1, 1975. Until that time, the emergency temporary standard will remain in force.

We are dismayed and disappointed with the severity of the new standard, because it is not consistent with scientific evidence on the potential hazards of VCM as presented earlier this year in public testimony. Since first learning of the hazards associated with VCM exposure, we have expended considerable time, effort and money to reduce the VCM levels to which you may be exposed, and our efforts have been fully successful in achieving compliance with the temporary standard. Furthermore, we plan to continue to further reduce exposure to VCM. However, the new standard is in our opinion unreasonably restrictive and we don't know of anyone in the Industry who can meet it.

We have not seen the full text of the new standard yet. Rather, our information to date is based mostly on media accounts. For now, we intend to continue our efforts to reduce VCM exposure potential in the plant and to study the new standard in detail. We will keep you informed of the situation as further information becomes available.

/m

R. L. Bourget
R. L. Bourget
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RSV 0020217

Monsanto

D. L. Gendron

cc. R.L. Bourget

March 31, 1975

SUBJECT IMPLEMENTATION OF OSHA VCM STANDARD

REFERENCE

O All PVC Personnel

The permanent OSHA standard limiting exposure to VCM will go into effect on April 1, 1975. The purpose of this memo is to remind you of the general requirements this standard places on us all.

1. All of 84 Bldg., the tank farm, the BDT and RVCM buildings, the VCM pumphouse and the surrounding yards are considered REGULATED AREAS. You, as a PVC employee, are automatically entitled to come and go from the area at will. Certain Maintenance personnel, such as Area Mechanics who must work in the area daily, are similarly authorized. All other people must observe the barriers placed around the area and must sign in when on Monsanto business in the area. Visitors and transients who have no business reason for entering the REGULATED AREA are forbidden to enter. If you see someone in the REGULATED AREA who you think should not be there, please consult a member of PVC Supervision immediately.
2. All interior areas of 84 Bldg. except the locker room, hallway, respirator room and the switch rooms, plus the BDT and RVCM buildings, plus the yard around and above the latex tanks are considered HAZARDOUS AREAS as defined in the standard. However, because the VCM vapor levels in all these areas have been determined to be less than 25 ppm measured over 15 minutes, respirator wear is optional with each of you. Personalized Whitecap respirators will be set out for you in the respirator room, the cleaning station will be stocked, and the SDP for respirator use is posted on the bulletin board on the north wall of the hallway. If you wish to wear a respirator while in your work area, you may. We only ask that you abide by the standard procedure in doing so. If you have any questions, any member of PVC Supervision will assist you. Notice that tampering with any respirator at any time is strictly forbidden in the standard procedure.

RSV 0020218

3. Certain modifications to existing processes and equipment have been made which were necessary to reduce VCM vapor levels below 25 ppm. It is essential that these conditions be maintained at all times to avoid mandatory wearing of respirators.
 - a. Besides the normal kettle floor exhaust fans, the new kettle floor makeup air system and the air handler which supplies air to the locker room and the respirator room must run continuously.
 - b. All ventilation in the RVCN building must run continuously.
 - c. Ventilation in the BDT building must be used in accordance with SDP 84-612.02, Procedure for Flushing BDT Vent Filters.
 - d. The kettle exhaust fan system must be used in accordance with SDP 84-612.03, Use of Kettle Exhaust System.
 - e. All latex tanks must be closed with the covers dogged down. Remember that special valves have been installed for obtaining latex samples from the bottom of these tanks.
 - f. All interior and exterior doors and windows in all buildings must be kept closed at all times.
4. Despite all precautions to date, certain operations remain which will require mandatory wearing of respirators. These operations, mostly of a maintenance nature, will be published separately in a revised list of work rules. This list will also include operations where the use of other personal protective equipment besides respirators is required or recommended.

I believe that it is possible to work comfortably yet safely under the provisions of the OSHA VCM standard. However, because we must all do things a little differently than the ways we're used to, everyone's cooperation will be necessary to insure that we continue to comply with the law while still achieving our production, quality and routine safety goals. There may be specific instances not covered previously which will raise questions as you encounter them. If so, please bring them to the attention of a member of PVC Supervision so that we can resolve these potential problems quickly and safely. Again, your cooperation is needed.


D. L. Gendron

4. GENERAL ADMINISTRATIVE ITEMS

RSV 0020220