



Air Products and Chemicals
INC.

Date 26 November 1974

INTEROFFICE
MEMORANDUM

Subject Records for VCM Monitoring
Re: Letter ARA 9 Oct. 1974--Action
Steps Approved by R.F.--#6

To T. L. Carey
From Howard L. Watson

Valley Forge
(Location, Organization, or Department)
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(Location, Organization, or Department)

cc: A. R. Adams	J. D. Evers	J. D. Kramer	J. T. Sebastianelli
<u>J. T. Barr</u>	R. Fleming	A. K. McMillan	G. B. H. Speed
T. L. Carey	D. Franke	J. C. Novak	L. Thompson
B. Driver	R. E. Jones	E. Primeau	Po-Wen Wang

Pursuant to our assignment in the referenced memo, Darrell Evers and I met at length with Po-Wen Wang yesterday 25 November 1974.

We discussed the recording of permanent records of area monitoring in those areas where such records are now produced by virtue of one or more continuous on-stream analyzers. The locations include Escambia PVC, Calvert PVC, Calvert Emulsion, and South Brunswick (when VCM is eventually run).

Other areas which may be action levels (when finally determined per action step 1 in referenced letter) include Piscatway PVC Labs, Allentown PVC Labs, and Linwood PVC Labs.

We are prepared to continue medical records and medical surveillance in all of these areas by virtue of our program, a preliminary copy of which was issued for review 21 November 1974. In it, the required performed monitoring records have been established.

The area records are not required, per se, by the standards. They are inferred, however, as a necessary tool in doing "feasible engineering to assure that employees are not exposed to VCM concentrations at or higher than the permissible limit". In the laboratory area, such assurance will probably have to be given by a program outlining the use of hoods, local exhaust, air supplied respirators, etc.

In these larger manufacturing areas these continuous analyzers seem to be the most practical method of determining a zone in which VCM is starting to appear; guiding the repair by the leak patrols; providing the zone flashing alarm lights to alert the employee; and generally assuring us (and others) that we are running our operations so as to prevent our employees from being exposed to "at or higher than the permissible limit".

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SUBJECT: RECORDS FOR VCM MONITORING

A record that we deemed suitable to show what control we are exercising is outlined in facsimile below. Our efforts will be to see if the computer equipment being installed at Calvert City can produce this type record, or some other which we deem equally informative. A meeting at Pensacola with those who put computer design together at Calvert City and Escambia will be held Friday, 6 December 1974. Po-Wen Wang from MID will work with us and this group in programming and realizing the type report we finally come up with.

FACSIMILE REPORT - ON COMPUTER READOUT DAILY

	0001 Hours	1 January 1975 -	Shift Employee	
		9062	9073	6052 7026 1235 etc.
<u>TIME</u>	Foreman 6028 <u>ZONES</u>	1	2	3 4n zones
(20 Min. Inter- vals Index/Line)				
0020 hrs.		A		
0040 hrs.		A		A
0100 hrs.		A		C
0120 hrs.			A	C
0140 hrs.			B	B
0200 hrs.			B	A
0220 hrs.			A	
0240 hrs.				
	Employee 9073 Left Area		Employee 9074 Entered Area	
0260 hrs.				
0300 hrs.				

The above record would give you the following permanent record and information.

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1. Employees in regulated area on shift record by employee number. Non-employees would be entered manually by name and time.
2. At 0020 hours and until 0100, Zone 2 would have been at >1 ppm <5 ppm VCM. This would have called for Action Plan A (plan to be formulated as an action step) to have been put into effect and initiated by Foreman on duty.
3. At 0120 hours, Zone 3 went to Condition A, calling for Action Plan A. However, the source evidently wasn't found or the leak patrol was unable to correct immediately, as the zone went to Condition B (>5 ppm <25 ppm) at approximately 0140 hours. Action Plan B would then be put into effect and foreman's log would indicate and be signed. The source was cleared up such that at 0220 hours, the zone returned to Condition A and at 0240 all zones were cleared.
4. Zone 4 shows essentially the same information except that it went to Condition C at 0100 hours (>25 ppm). Action Plan C would have been put into effect until at 0220, the zone was again clear.

We will discuss the above approach at Pensacola on 6 December. If any recipient of this memo has input you feel helpful to guide us, please give us a call.



Howard L. Watson