

Firestone
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TO MR. C. J. KLEINERT

FROM F. F. HOY/K. H. GARNER

REFERRING TO LETTER OF

SUBJECT

VINYL CHLORIDE SAFETY ASSOCIATION MEETING
ATLANTA, GA. 2/27/76

Firestone Representatives: K. H. Garner and F. F. Hoy

The meeting was mostly devoted to the OSHA-VCM standard and the proposed EPA-VCM standard. This report is divided into two parts, the general report and an appendix. The first part covers the highlights of the meeting, significant comments or new developments and a general impression of the status of the various PVC producers in their compliance efforts. The second part outlines the specific comments as each company representative spoke on his company's progress. This latter section is for reference rather than general information.

All but a few of the producers were represented and each was allowed five to ten minutes for a presentation. The presentations therefore were brief summaries. Not sufficient time was available to pursue all topics nor to discuss any issue in great depth. The meeting was helpful, however, in updating our assessment of the problems and successes the industry is encountering in its drive for compliance.

1. The representative from Ethyl reported that a deputy director of NIOSH told their medical director in a telephone conversation that there is a cartridge mask under development that will trap VCM on inhalation and release it on exhalation giving the cartridge a 12 hour life. More significantly, in the same conversation he told their medical director there is a good chance for a nine month extension of the optional use of masks while mask improvement continues. No one else reported any knowledge of this possibility.
2. Nearly all companies reported they are making regular physical examinations mandatory as a condition of continued employment with no disagreement from their employees even though OSHA says the standard does not require it. We got the impression that any who received a militant objection from their employees gave up the mandatory stance, however.

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3. Reported average readings were low, in the range of 0.5 PPM to 2.0 PPM with a few companies reporting averages up to 3.0 PPM. The range for personnel monitoring was about the same. Firestone reported higher readings and specified them for the poly buildings. We believe from comments that these low averages included essentially all areas of their plants, even areas we would not list as regulated. Averages such as this are, of course, meaningless except for publicity releases. Nearly all companies, even the monomer producers, admitted numerous excursions well above these levels. One company counted 400 excursions above 10 PPM in a month of 50,000 readings.

There were some inconsistent comments in this area. A monomer producer said their whole plant was deregulated but noted the use of self contained air masks for certain specified operations or for all exposures over 100 PPM. On all subjects except exposure readings, however, the reporting appeared to be frank and open.

4. We concluded that a few plants, notably the new ones, are better off than the Perryville Plant, a number about the same and some worse off. None appeared to have as great a problem as the Pottstown Plant, but we may have been misled. Companies with both older and newer plants may have discussed primarily the newer ones. We concluded also that some plants were farther along with their programs than Firestone and some not so far. We seem to be about at the middle of the pack.
5. The position of most companies on outside contractors is similar to Firestone's. Information is provided and the burden of compliance is placed on the contractor. Whether this position would satisfy OSHA, no one was sure. Some companies provide equipment and lab service, others provide nothing. A few excluded outside contractors from regulated areas. One had an arrangement for a complement of regular contractor employees and provided the full program as for their own employees. All who mentioned contract maintenance treated them as their own employees.

The most remarkable situation was described by Goodrich. They claimed Kentucky state OSHA officials approved a plant whereby they would evacuate outside contractors if an exposure over 5 PPM occurred and on this basis exclude these people entirely from coverage by the standard. Therefore no physicals, masks or even training are provided.

6. Bendix and Arcas chromatographic systems appeared to be preferred for area monitoring. Most either had these systems tied to a computer to calculate averages or were heading in that direction. A few have Miran systems. One said it was not sensitive enough for their purpose. Number of points monitored per plant ranged from 12 to 80 with the majority using 20 to 30 points.

6. Two companies, Pantosote and Georgia Pacific, have previously said they will tie their operators to the area monitors via the computer and avoid monthly checks on individuals. There does not seem to be any great move in this direction. Most companies who discussed individual personnel sampling take six to eight hour checks with slow, intermittent pumps and tubes rather than the 10 minute samples we take. One company used a jacket with a pouch in the back to hold a Tedlar bag for eight hour samples. No data was given for typical TWA readings for individual operations by any company. All personnel were averaged together to get the 0.5 to 3.0 PPM discussed elsewhere in this summary.
7. The preferred mask is the half face piece, air line mask. Some feed the air line from bottles. Methods to avoid exhausting the bottles mostly involved inventory checks. This might not pass an OSHA inspection. Two companies had nose bleed problems with bottled air. Rust in pipe systems with humidified air can be a real problem. One company is considering a change to plastic pipe. A number of companies use masks in reactors regardless of VCM level. All use some self contained air masks and canister masks along with the air line masks. Some companies anticipate using canister masks to 25 PPM. Others intend to use air line masks above 1.0 PPM and minimize canister mask use. In general few employees willingly used any kind of mask in the 1-25 PPM optional range.

A number have held trial mask runs which came to be described as "April 1 weeks". No one admitted to the resentment of masks which Firestone experiences. In answer to a specific question whether mask use had to be enforced by reminders during such a trial run, one representative claimed no discipline was used and little reminding was necessary. We accepted this without obvious disbelief. Companies with URW organized employees described slight militance in some areas but nothing on the scale of the aggravation at Pottstown.

Rumors we have heard of approved cartridge masks are not true. No company had any approval to use cartridge masks at any VCM level. However, Henry Waltemate, a safety manager at B. F. Goodrich said they have federal OSHA approval to use a half mask with a canister for exposures to 10 PPM. Grover Wrenn was involved in the approval. He said they have simply connected a half face mask from a supplied air system to a canister. We have been told a switch of equipment pieces alone would void NIOSH approval. We should check further into this.

Two companies reported OSHA inspectors equipped with cartridge masks. At one plant these inspectors accepted canister masks; at another, they wore the cartridge masks to inspect regulated areas. MSA and Scott were said to be working on a "transfer" or "combination" mask for use with air or charcoal. Most companies are eager for this approval. The problem of how to get to an air line mask in a regulated area was discussed but not solved.

8. We did not get much discussion going regarding females in regulated areas. Apparently only a few companies restrict them. Stauffer, one of the companies which did not use females, has now located several whose application indicated they could not bear children. We were told they had passed an EEO compliance audit.

PPG reported that at their Lake Charles VCM plant they do not accept females capable of becoming pregnant for VCM areas. They involved OSHA and EEO in a discussion over this and EEO backed off.

9. John Barr of Air Products described an incident whereby an accidental vent of approximately one and one half pounds of VCM at their laboratory at Piscataway, N. J. caused a great uproar with air quality people and may adversely affect the industry request to exclude laboratories from the EPA standard. Anyone who needs details can get them from K. Garner or F. Hoy.
10. John Barr reported on the EPA standard. We already have most of this information. He felt the situation is too political for EPA to give much ground. He also noted that because of the rule-making procedure EPA cannot legally grant any extensions beyond two years. It was mentioned that since the rules are promulgated under section 112, the standard will be administered by the federal agency rather than turned over to the individual states. This was expected by him to be helpful since the over burdening attitude of the Maryland Air Quality Board appears not to be unusual for the state agencies. Ed Biehl of Atlantic Tubing discussed requirements placed on their new plant by state air quality people that were far reaching and complex nearly beyond belief. He said they had a consultant company working for three months to gather the necessary data.

It was suggested that EPA would eventually get around to comparing the leak monitoring plans submitted by the various producers and require that all adopt the most vigorous plan submitted. One well received suggestion was that two consecutive 25 PPM readings on an area monitor be regarded as an indication of a leak. Regarding regular checking for small leaks, it was felt by some that an acceptable plan would have to include at least a couple hours of checking every day. One attendee felt the leak check could ignore flanges and valves not normally opened and any systems which were pressure checked. Another man said his plant had begun to catalogue and number flanges, valves, etc., but gave up at 4000.

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