

January 26, 1976

OSHA AUDIT ACTION ITEMS

Louisville Trip
January 21-22, 1976

Each action item is followed by the persons name who has accepted the responsibility.

General

1. Progressively reduce alarm levels from 25 ppm in all areas to avoid a drastic change on April 1, 1976 (Martin).
2. Reduce breathing air supply pressure to improve comfort level. Experiment with humidification at lower pressures and at the point of use to increase relative humidity (Michels).
3. Endeavor to reduce respirator wearing to 20% or less of the work day (Barrett)
4. Resolve problem with poor breathing characteristics of disconnected masks (Martin).
5. Shield mini-computer to avoid problem with nearby microwave transmissions (Michels).
6. Aid in development of mask usage strategy by additional in-mask comparative sampling (Fannin).
7. Report any changes in VCM breakthrough after VCM sample tube conditioner is back in service (Fannin).
8. Consider assignment of OVA meter to each process area so leakage source can be identified rapidly (Barrett-Fannin).
9. Increase number of breathing air stations as is required (Barrett).
10. Supply other four PVC plants with copy of your OSHA booklet, also exchange VCM control team minutes and other pertinent data (Barrett-Fannin).
11. Arrange visit and three party information exchange with Henry at Avon Lake plant (Barrett-Linak).

Building 1, 111, 121 Ventilation

1. Complete gas chromatograph installation before April 1, 1976 (Striby).
2. Correct low spots in duct work leading to common stacks (Michels).

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Building Ventilation - con't.

3. Considering each floor as a unit to be ventilated, pinpoint fugitive emission sources so spot ventilation can be utilized. Collect data on AVCM in inlet and exhaust air to evaluate progress (Barrett-Fannin).
4. Use common vent stacks to better advantage by piping in extraneous vent stacks and steam jet discharges (Michels).
5. Investigate and have corrected any cross contamination between regulated buildings, especially Buildings 111, 115, and 121 (Fannin).
6. Investigate and report reason for low pressure at foot of common stacks. Quantitize emissions from common stack and other vents, issue monthly report to record progress (Fannin).
7. Exchange information and develop methods for sealing and draining condensate from common stack (Linak).
8. Institute a maintenance program for periodic check of ventilation systems (Striby).
9. Shroud VCM charge pumps and provide spot ventilation at pump seals (Striby).
10. Provide necessary ventilation to utilize existing sope and pigment rooms as safe havens (Barrett).

Tank Farm

1. Provide Bendix THA coverage for VCM tank farm area (Holstein).
2. Conform to OSHA regulation regarding hazardous operations area when unloading VCM (vulnerable to citation), including signs and standard operating procedure instructions (Holstein).
3. Provide vacuum recovery system for VCM tank car disconnect and other venting operations (vulnerable to citation) (Holstein-Wagner).
4. Modernize VCM transfer pump installation. Minimize relief valves, pump seal leakage, vibration, etc. Cleveland Engineering will aid as needed. (Holstein-Brodine)
5. Revise breathing air and respirator protection (Holstein).

PVC Reactors

1. Establish cut-off date for 202 manufacture (Harrington).
2. Install hot water displacement equipment on small stainless steel polys to eliminate fugative VCM emissions quickly (Barrett).

PVC Reactors - con't.

3. Provide plant with WVCN stripper design and design basis for steam sweep for AVCM displacement (Calsing).
4. Check and correct reason for inadequate air flow in Building 1 poly exhaust system (Michels).
5. Vacuum hoses need to be put into good operating condition (Barrett).
6. Add cut-off valves on Building 1 red ball vent lines (Barrett).
7. Develop method for hot water flush of PVC strainers before opening (Barrett).
8. Cover water sumps and drains from which fugative VCM can be released (Barrett).

T. R. Linak

/kats

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