

INTER-OFFICE
CORRESPONDENCE

TO: See Distribution

DATE: March 15, 1985

FROM: D. A. Longhini

LOCATION: Barberton Development

SUBJECT: PVC Latex Pilot Plant
Personnel Safety
Review Meeting Minutes

A meeting was held on March 14, 1985, to discuss personnel safety in regards to the proposed PVC latex pilot plant. Roger Corley, Maggie Virostko, Steve Hanna, Mike Hogan, Gary Gardner, Brian Warnock, and David Longhini attended the meeting. The discussions were centered around the OSHA requirements for handling vinyl chloride monomer. Subjects covered were as follows:

1. Regulated Area. A regulated area must be established which will include all areas where the possibility exists for the vinyl chloride concentration to exceed the permissible exposure limits. This area will probably include at least the bottom three floors of the biochem mini pilot plant building and any outside area where VCM is stored. Access to this area will be limited and warning signs must be posted at entry points.
2. Medical Surveillance. Anyone who works in the regulated area on a regular basis must be included in the medical surveillance program. Lake Charles uses a standard which requires anyone who will work in the plant for more than three days to participate in the program. Contractors and maintenance people are included. Casual visitors do not need to be included although access to the area should be limited.

Dr. Del Greco is familiar with testing requirements. Dr. Del Greco may want to consult with the Lake Charles plant doctor because of some problems they've had in the past with the liver function test.

3. Monitoring. Two types of air monitoring systems will be utilized in the pilot plant. First, a gas chromatograph will continuously sample and analyze several key points in the area. This system will function primarily as a leak detection system and will sound an alarm if a high level of VCM is detected. The second type of monitoring equipment used will consist of portable personnel monitors carried by workers in the area. This type of monitoring will be used to determine whether or not the OSHA guidelines are being met. While this level of monitoring is not required for every person working in the area, every job type (engineer, technician, mechanic, etc.) must be covered.

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4. Training. A training program must be established to inform workers in the area of the hazards related to handling VCM. Procedures for handling emergency situations must be established and documented. Clyde Dennis and Murray Davis are the Lake Charles contacts in this area.

5. Respiratory and Skin Protection. Three levels of respiratory protection will be provided:

- I. Cartridge Respirators. These should be carried on normal rounds and worn when taking samples or any other time when low level exposure (<10 ppm) is probable.
- II. Bottled Air System. This system will consist of a full face mask with a hose and bottled air supply. It will be used when opening vessels or other situations where the potential exists for higher level exposure.
- III. Scott Air Packs. These should be used for emergency purposes only.

Chemical resistant rubber gloves are usually all that is necessary to prevent skin exposure. A slicker suit should be available in case of a major liquid leak.

6. Reporting and Record Keeping. A system is already in place for maintaining the records related to personnel monitoring and medical surveillance. A report must be issued to OSHA within a month after startup of the facility. OSHA must be informed within 24 hours of any emergency situations if they result in a "massive release of vinyl chloride" and if a worker is exposed to the release.

If personnel monitoring indicates that an individual has been exposed above the permissible exposure limits, he must be informed within ten working days. There is already a system within the plant which should take care of this requirement.

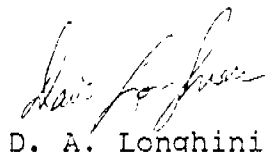
7. Assignment of Responsibilities. While everyone involved with the project is responsible for making sure the operation is safe, certain areas of responsibility were established to prevent duplication of efforts.

- A. Medical Surveillance - Virostko
- B. Personnel Monitoring - Kuryla; Hogan
- C. Respiratory Protection - Hanna
- D. Training - Project Engineers
- E. Reporting and Record Keeping - Hanna, Virostko

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No specific actions are required at this time because the project has not yet been approved. However, cost estimates for building and operating the plant will be formulated within the next few weeks. Individuals may be asked for input for these estimates regarding their areas of responsibility.

Insurance regulations were discussed briefly. IRI will be informed after the details of the project are further defined. Since the expected cost of the project is well below the deductible level of the insurance policy, only an informal notification will probably be necessary. Roger Corley will interface with IRI.



D. A. Longhini

/vf

Distribution

Gary Gardner
Brian Warnock
Maggie Virostko
Lynn Kuryla/Mike Hogan
Roger Corley (G.O.)
Steve Hanna
Gerry Neikirk
Dennis Kowalczyk (Springdale)
Gene Laukonen/Al Mavity