

To: Axel TBOS

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VCH

FYI - OFFICIAL ~~ADVICE~~ STATEMENT, RE:

OSHA STANDARD. STATEMENT

10-2-A

Re: Draft Statement to Press in reference to queries about petitions for review.

Hooker Chemicals and Plastics Corp. has today filed a petition for review in the United States Court of Appeals for the second circuit. A similar petition for review was filed by the Society of Plastics Industry (SPI).

The purpose of these petitions for review is to ask the Court of Appeals to review the standard relating to employees' exposure to Vinyl Chloride which was promulgated by the Occupational Safety and Health Administration, United States Department of Labor. This standard was issued after an extensive public hearing in June and July, 1974. We expect that many of the companies and organizations will also be filing petitions for review of this standard.

In filing this petition for review, Hooker would like to reiterate it's concern with the Health and Safety of all of its employees. The standard which has been promulgated relates to levels of exposure in Vinyl Chloride Monomer, PVC, and fabricating plants. Hooker is seeking the Court's review on the question of whether the standard promulgated by OSHA is consistend with the Occupational Safety and Health Act of 1970.

Ed Smith-Legal/kr

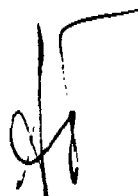
OCC 1696

SPI

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.
250 PARK AVENUE • NEW YORK, NEW YORK 10017 • 212/687-2675

IMPORTANT NOTICE

VCM - PVC



TO ALL SPI VOTING REPRESENTATIVES

At 2:30 p.m., October 1, 1974, Assistant Secretary of Labor John H. Stender announced final job health rules for reducing worker exposure to vinyl chloride.

Briefly summarizing, the requirements are:

On January 1, 1975, employers must reduce levels to one ppm averaged over any eight-hour period, and five ppm averaged over any period no longer than 15.

Reduction of exposures to at or below these levels will be made through feasible engineering and work practice controls. Where these measures will not reduce levels enough, the rules will permit reductions to the lowest practicable level with employee respiratory protection provided to meet the one ppm and five ppm exposure limits, Stender said.

Beginning January 1, 1976 - the third phase - wearing of respirators will be mandatory for workers exposed to levels greater than the one ppm and five ppm allowable limits. Until that date, wearing of respirators is discretionary for exposures no greater than 25 ppm.

Plans for reducing exposure to the permissible levels must be available on request of OSHA.

The new rules will apply to the manufacture, reaction, packaging, repackaging, transportation, storage, handling or use of vinyl chloride or polyvinyl chloride. They will not apply to the handling or use of products made of polyvinyl chloride.

Some other pertinent aspects of the regulations are:

Employers must set up "regulated areas" where concentrations of VCM exceed the "one and five ppm" limits, with access limited to "authorized" workers.

OCC 1697

Plans for reducing exposure to the permissible "one and five ppm" levels must be available on request of OSHA.

Direct contact by employees with liquid VCM is prohibited.

Monitoring and measuring programs must be initiated to learn whether exposure levels exceed 0.5 ppm. Depending on levels found, repeat measurements are required at least monthly or quarterly. They may be discontinued only when two consecutive measurements, no fewer than five working days apart, show individual employee exposures to be less than 0.5 ppm.

Any change in processes that may alter exposure levels will require new measurements for all affected employees.

Monitoring and measuring methods must meet accuracy requirements ranging from not less than plus or minus 50 percent in concentrations from 0.25 through 0.5 ppm to plus or minus 25 percent for levels greater than one ppm.

Where the regular monitoring program shows excursion levels may exceed 25 ppm, a continuous monitoring and alarm system must be used to alert employees to potential danger if they are using air filtering respirators (gas masks). At that level, they must switch to respirators with a clean air supply.

Employees and their representatives must be given "reasonable opportunity" to observe monitoring and measuring.

Protective garments as well as respiratory protection must be provided for employees in hazardous situations, such as cleaning operations in PVC vessels.

Written plans must be prepared for emergency situations (accidental release of massive levels) in facilities making or using VCM.

Employees in VCM or PVC operations must be trained fully on topics such as the nature of the hazards, protective measures and the contents of the OSHA rules.

Medical programs must include complete initial examinations. Subsequent ones will be required every six months for employees who have worked in VCM or PVC operations for 10 or more years, and annually for all other exposed workers. Alternative medical examinations will be acceptable if the examining physician states his procedures and reasons for substitution. All medical checks are at no cost to employees.

Specified signs or labels are required at entrances to "regulated areas" in hazardous operations or emergency areas, on containers of PVC resin waste, PVC containers and VCM containers.

Page three

Records of required monitoring and measuring, medical records, and rosters of "authorized" workers must be kept for varying specified times, or to be sent to the Director, National Institute for Occupational Safety and Health, if an employer ceases to do business before the expiration of retention periods.

Reports must be made to the nearest OSHA Area Director no later than one month after establishing a "regulated area" and within 24 hours of any "emergency" exposure. Also, reports to affected employees must be made within ten days after monitoring and measuring shows exposure in excess of the "one and five ppm" limits, including the results of the measurements and steps being taken to reduce exposure to permissible levels.

The complete standard will be published in the Federal Register on October 4, 1974.

At 2:40 p.m. October 1, 1974, SPI (on behalf of the separately funded VCM/PVC producers group) filed a petition for judicial review in the Federal Court of Appeals, Second District in New York.

We will try to keep you informed as is possible.

Cordially,

Thomas J. McGrath
General Manager

hc
Oct. 2, 1974

RECEIVED

OCT 4 1974

TECHNICAL SERVICE DEPT.

OCC 1699



hooker
RUCO DIVISION

April 1974

INTER-OFFICE MEMORANDUM

To: L. Fabrizio ✓
R. Gazda
Copies to:
R.J. Abramowitz
J.B. Harrison

[Handwritten signature]

File Ref.: Prod./36-MM:tv

Date: September 26, 1974

From: M. McEachern

Div./Dep't: RUCO/Prod.Supt.

Location: Hicksville

Subject: PHENOL AS RECOVERED MONOMER INHIBITOR

Because of repeated problems with the recovered monomer, both now and in the past, I have proposed using phenol rather than TBC/Styrene in the recovery system.

I have described, to R.J. Abramowitz, the tendency for Monomer to polymerize both in the tank and in the column.

R.J. Abramowitz, approves trial of phenol as the inhibitor for recovered monomer and provided the following data on phenol:

- 1) Phenol solubility in water 6.7 gms. per 100cc @ 16°C
infinitely soluble @ 66°C

Since solubility probably on a logarithmic curve, we should investigate solubility @35 to 40°C.

- 2) Phenol infinitely soluble in methanol.

Investigate solubility of water/methanol system at various concentrations of methanol and various temperatures.

- 3) Phenol should perform same as an equivalent weight of TBC.

Solution quantities added should provide phenol equivalent of TBC normally added.

Phenol was the only inhibitor used when the plant was first on stream. Crystalline phenol was melted for use and stored hot. Rapid degradation occurred. We must refrigerate, as we do TBC, for long storage.

- 1) Investigate stability in solution with methanol or methanol/water.
- 2) Melt entire container and weigh out desired size increments. Store increments cold.

M. McEachern
M. McEachern

OCC 1700