

Interoffice Communication

To D. A. Kuhn - Houston
 From W. V. Henry
 Date December 2, 1975
 Subject O.S.H.A. Visit - VCM Regulations

On November 10, 1975 at 9:30 AM Glen R. Williamson and James E. Brown of the U. S. Department of Labor (Occupational Safety & Health Administration) arrived at the plant in regard to our reported emergency VCM condition on November 7, 1975. After showing proper identification they held an interview with the Plant Manager and myself for approximately one hour. They stated they were here mainly to investigate the release of VCM but would also like to look over our plant in general. The compliance officers asked questions in regard to the details involved in the massive release of VCM. They then requested to look at our records. These records included: daily personnel rosters for regulated areas, VCM monitoring, physicals, compliance manuals and also our general industry records.??

The compliance officers also stated they would like to talk to the union stewards. They interviewed James Couch (maintenance) and Rodney Little (operations). After this they requested to talk with James Sherwin (V-40 operator) and Larry Underhill (shift supervisor) who were on shift at the time of the release. Both of these employees were unavailable at the time. The officers stated they would contact these individuals later to discuss the incident. To my knowledge it was never done. After viewing our VCM Health Training slide show they took a brief tour of the plant. They looked at such items as our fixed point monitor, respirators, and J & W gas detectors.

At the exit interview, they requested a written report of the emergency incident (see attached). They commented that they were impressed with our program and stated that as far as they were concerned there would be no citation issued, but that the O.S.H.A. Area Coordinator has the final word on whether a company receives a citation.

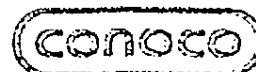
Both compliance officers were Industrial Hygienist and seemed to have a limited knowledge of a PVC plant. They mainly were concerned with complying with the OSHA regulations on VCM. In fact, during the inspection one of the officers constantly referred to a copy of the standard and followed it thru paragraph by paragraph in essentially all aspects except they took no gas samples for VCM measurement.

William V. Henry
 W. V. Henry
 Safety Director

bm

Attachment

VVC 000020589



RTF

Conoco Chemicals

Continental Oil Company
P.O. Box 15360
Oklahoma City, Oklahoma 73115
(405) 672-4551

November 17, 1975

Mr. L. A. Warren, Area Director
U. S. Department of Labor - OSHA
Suite 408 - Penn Place
Northwest 50th & Pennsylvania
Oklahoma City, Oklahoma 73118

Dear Mr. Warren,

This is the additional information you requested in regard to the emergency condition at the Conoco Chemicals Oklahoma PVC Plant on November 7, 1975.

Synopsis

At approximately 1000 hours on 11-7-75, a seal ruptured on a VCM compressor in the V-40 building. The V-40 operator was the only person in the building at the time the rupture occurred. His first reaction was to notify the panel operator who immediately blocked in the system. His next action was to manually close the valve on the discharge side of the compressor. This was done on his way out of the building. Only a few seconds after the rupture, the audible alarm on the J & W gas detection system sounded, followed shortly thereafter by the deluge of water. (The audible alarm is triggered at 20% LEL and the deluge activates at 40% LEL.) It is a standard procedure for everyone in the V-40 area to evacuate on the sound of the audible alarm.

The area was monitored approximately 5 minutes after the rupture. Levels of 100 - 110 ppm were present by the exhaust fans on the west side of the V-40 building. It took approximately 15 - 20 minutes for the leak to subside. When the J & W gas detectors indicated 0%, the inside of the V-40 building was monitored. Levels of 25 - 50 ppm were evident within 5' of the ruptured seal. No one was allowed to enter the building without fresh air masks. The seal was repaired by approximately 1400.

Employee Exposure

Only the V-40 operator was exposed to the vapors without respiratory protection. His estimated time of exposure was 10 - 15 seconds.

VVC 000020590

November 17, 1975
U. S. Department of Labor - OSHA
Page 2

Medical Surveillance

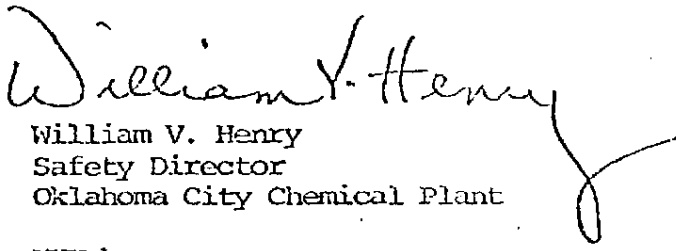
Because of the operators short time of exposure and the absence of physical effects combined with his routine blood tests twice a year and physical examination once a year, our Medical Division recommended that no specific medical attention was needed.

Cause of Rupture

The high Level Indicator was inoperable on the VCM receiver tank. Liquid VCM overflowed into the recovery compressor causing the seal to rupture.

Preventative Measures

Another VCM receiver tank was put in service after the rupture. The broken High Level Indicator will be repaired as soon as the receiver tank is emptied and cleared. The High Level Indicators will be included in the plants preventative maintenance program.


William V. Henry
Safety Director
Oklahoma City Chemical Plant

WVH:bm

VVC 000020591

Uniroyal to Close Plant In Painesville, Ohio, Due to PVC Standards

By a WALL STREET JOURNAL Staff Reporter

NEW YORK—Uniroyal Inc. said it intends to close its only polyvinyl-chloride-manufacturing plant, at Painesville, Ohio, and quit making PVC.

The company said it couldn't economically satisfy stringent government regulations that limit worker exposure to vinyl chloride, the gas from which PVC plastic is made.

Uniroyal would become the first company to close a PVC resin facility because of standards put into effect last April. Those standards limit worker exposure to vinyl chloride to one part per million parts of the air they breathe, one-fiftieth of the level allowed before vinyl chloride was linked with a rare liver cancer in PVC workers.

In addition to the standards of the Labor Department's Occupational Safety and Health Administration, Uniroyal also cited proposals of the Environmental Protection Agency, to limit plant emissions of vinyl chloride into the environment, as a reason for its "tentative" decision to close the Painesville plant.

A spokesman said the decision was termed tentative "to give a chance to explore all possible alternatives with the union." If the plant is closed, Uniroyal said, about 230 employees would be laid off.

The 29-year-old Painesville facility is one of the nation's oldest PVC-manufacturing plants. When the OSHA standards were proposed last year it was assumed that some of the oldest PVC plants would have to close because of inability to meet the restrictions. But other companies with older plants have been able to effect engineering changes to enable them to meet the OSHA regulations.

Uniroyal isn't a major factor in the PVC market. Industry sources said the Painesville plant has a capacity of about 120 million pounds of resin annually, or about 2.2% of total U.S. capacity.

Uniroyal said that its plans to stop PVC production won't affect synthetic-rubber operations at Painesville, or the production of Naugahyde vinyl-coated fabrics in four other company plants. A spokesman said vinyl would be purchased from other companies.

The company said it also would continue to make vinyl chloride gas at a facility jointly owned with Borden Inc. at Geismar, La.

VVC 000020592

VVC 000020593

THE WALL STREET JOURNAL, 19
Friday, Oct. 10, 1975

Vinyl Chloride Curbs Are Stiffened in Britain Under Voluntary Plan

Special to THE WALL STREET JOURNAL

LONDON — A British industrial health and safety group announced guidelines that tighten vinyl chloride vapor limits at six plastics-making factories owned by major British concerns.

The guidelines are voluntary but were arrived at in coordination with the plastics industry. The companies covered are units of Imperial Chemical Industries, Ltd., British Petroleum Co., Vita-Tex Ltd. and Turner & Newall Ltd. They account for the bulk of plastics production in Britain.

Under the new guidelines, an average of 10 parts of vinyl chloride gas per million parts of air will be allowed over an eight-hour work period, compared with 25 parts per million previously. Also, the new ceiling for any one time is 30 parts per million, compared with 50 parts previously.

The health and safety group that produced the code comprises representatives from various government agencies and employe and union representatives. Polyvinyl chloride plastic is made from vinyl chloride monomer, a gas that has been linked to a rare liver cancer.

In the U.S., worker exposure is limited to one part vinyl chloride per million parts of air, and no more than 15 parts per million averaged over a 15-minute period.