

MEMORANDUM

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MAY 7 1975

J. M. QUINN

DATE: May 5, 1975

SUBJECT: OSHA PROGRAM DIRECTIVE - VCM INSPECTIONS

TO: Mr. J. M. Quinn

Following are BRNW comments on subject directive. The number and letter designation follow the document as received.

3. (2) (a) - We have placards for our VCM cars and have been labeled as required.
3. (6) (a) - The interpretation given in this section is very helpful. We normally run 6-hour TWA's. Giving a plant up to 1.66 ppm for a 6-hour TWA can only be interpreted that the remaining two hours are at 0 concentration.

$$(1 \text{ ppm} + .25 \text{ ppm (analytical and sampling error)}) \times 8/6 = 1.6 \text{ ppm}$$

However, we consider the 6-hour run and no analytical or sampling deviation and will send out letters to all people who exceed 1.05 ppm VCM by our calculations.
- 9" (d) Monitoring - Program has been established and we are following the regulations as to frequency. There is a possibility that during the month of June we may not meet all of the regulations if a great many new people bump into the vinyl chloride plant.
- 10" (2) The required program for monitoring has been put into effect.
- 12" (4) (a) (b) (c) (d) - We have established the 95% confidence level and are complying with the requirements for record keeping. We are also using the NIOSH method for analysis.
- 13 (e) (a) - We did not establish the regulated area until May 1, 1975 instead of April 1, 1975 as stated in this section. We will not know if we meet the 5 ppm 15-minute excursions until continuous monitoring is installed.
- 14" (2) (a) - We have established a record keeping and log system.
- 15" (f) - We have a plan on record for engineering changes and work practice controls, but have not submitted anything to OSHA.
- 16" (g) - This will probably be the hardest part of the program to get compliance. It really does not make any sense. You can have a violation if the concentration exceeds 5 ppm in a 15-minute period, yet they do not require the use of a respirator until the concentration of VCM reaches 25 ppm until April 1, 1978.

DISTRIBUTION	
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JMD	<i>[initials]</i>
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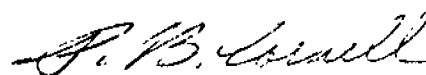
- 17"(2)(a) - We do not know what OSHA means by respirators. If it is the small cartridge type that is normally worn in the vinyl area as we know, none has been approved. We do have on hand approved cartridges for regular full face mask MSA type.
- 18"(3)(a) - This program has not been set up yet but should be in the next month.
- 19"(i) - This requirement is being complied with.
- 20"(ii) - Continuous monitoring system is now being installed.
- 22"(i) - Emergency plan written up and is on file.
- 24"(j) - Training plan for all present employees has been completed. Will probably have to start it up again for employees who have not had it and will bump into vinyl plant.
- 26"(k) - Medical surveillance is being done and will continue. Approximately 130 employees have been tested.
- 28"(4) - We have started compliance with this section and will continue to do so.
- 29"(5) - We have done this to one technical employee whose test ran high. On subsequent testing he was OK. One environmental lab person has shown some deviations. If he works with vinyl, we continuously monitor him during that time. Testing has shown no exposure to vinyl in the environmental lab areas.
- 30"(6) - We use the Pathology Lab in Baton Rouge to run the tests. They have been inspected in March by HEW. We have not received a license number from them.
- 31"(1) - Sign and labels being completed.
- 32 (n) - Letter to District Director of OSHA on establishment of regulated area mailed April 29, 1975.
- 35"(3) - We have notified two people by letter since April 1, 1975. Both of them showed a TWA of approximately 2 ppm VCM.

b. Citations

- (1)(a)(i) - We have not had any such situation.
- (1)(a)(ii) - Can't tell whether we comply with this section until continuous monitoring is established.
- (1)(a)(iii) - This will be difficult to enforce especially during the summer. The wearing of full face masks or demand air supplies will make it very difficult for a man to work.

Any of the numbers that appear in the original document that are not listed in the above means that we are either in compliance with the regulation, they don't apply to this plant, or they are self-explanatory and do not require any comments.

One general comment can be made on the whole document. There are a multitude of records that must be kept. Plant enforcement of some of the regulations will be difficult. It is a very cumbersome procedure but we will make a very good faith effort to comply with all of its provisions. Copies of this document were provided to the superintendent of the VCM-EDC plant and to the safety supervisor.



P. B. Cornell, Manager
Baton Rouge North Works

AJL:ef

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