



Interoffice Communication

To OSHA - ENGINEERING AND WORK PRACTICE CONTROL PLAN FILE

From V. E. Messick

Date February 6, 1981

Subject UPDATE OF ENGINEERING AND WORK PRACTICE CONTROL PLAN

Attached is an update of the plant's engineering work practice control plan for the reduction of employee exposure to vinyl chloride.

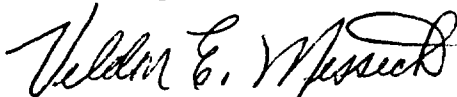
Although most all planned engineering and work practice control programs for the plant have been implemented, some of the normal operational jobs do require the use of fresh air respirators. The OSHA vinyl chloride standard states "Employees engaged in any operation, procedure, or activity where a release of vinyl chloride liquid or gas might be expected as a consequence of the operation, which would result in an employee exposure in excess of the permissible limit, shall be provided and required to wear respiratory protection." Employees must use fresh air respirators for the following operations because the possibility of exposure to greater than the permissible limit exists for these operations.

1. Opening any piece of process equipment in vinyl chloride service including:
 - a. Pumps
 - b. Compressors
 - c. Filters
 - d. Vessels
 - e. Piping
2. Opening a Lenape manway on a reactor without using steam jet evacuation on the reactor.
3. Entering vessels or any confined area that have contained vinyl chloride.
4. Opening the dome cover on vinyl chloride railcars and hooking up and disconnecting lines to unload the railcars.
5. Entering the vinyl chloride railcar unloading compressor shed regulated area.
6. While on top of the large blend tanks which are regulated areas.

7. When using the portable vinyl chloride detector to pinpoint a vinyl chloride leak detected by the continuous monitoring system when the VCM concentration is expected to exceed 10 ppm.
8. Reactor dumping normally does not require the use of a fresh air respirator. Abnormal conditions which would require a fresh air mask are:
 - a. When working on a plugged reactor dump valve or line.
 - b. Dumping a coarse batch
 - c. Inoperative Sweco exhauster.
9. Sampling of reactors, VCM railcars, or storage tanks.
10. The heated water vapor coming from vents in the old unit sewer during pump-out of the blowdown tank contain concentrations of VCM above 1 ppm. If an employee must perform work in an area where these vapors exist, an air mask must be worn.
11. Any other operation which has the possibility of resulting in exposure greater than the permissible exposure limit. The permissible exposure limit is defined as:
 - a. No employee may be exposed to vinyl chloride at concentrations greater than 1 ppm averaged over any 8-hour period, and
 - b. No employee may be exposed to vinyl chloride at concentrations greater than 5 ppm averaged over any period not exceeding 15 minutes.
 - c. No employee may be exposed to vinyl chloride by direct contact with liquid vinyl chloride.

VCM canister masks may be used under the following conditions:

1. Working in a contaminated area of less than 10 ppm VCM for up to 10 hours.
2. Performing leak detection operations when Honeywell units are indicating between 1 and 10 ppm VCM.
3. Lab and Compound Department personnel may perform their normal duties when VCM levels are less than 10 ppm VCM as measured by Lab Honeywell unit.
4. Escape from an area of high VCM concentration to obtain a Scott Air Pak.



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Attachment

c: CLM, CRM, PEM(6), SJV(5), AHS, JVu, RDJ, JAD, RAF, VLT