PPG INDUSTRIES

INTER-OFFICE CORRESPONDENCE

Date: April 21, 1977

From: Z. G. Bell, Jr.

To: L. B. Grant, M.D.

Location: 10 West

Subject: April 6 letter
Monitoring Summary

In response to your suggestions outlined in your April 6, 1977 correspondence for monitoring summaries on VCM for plant physicians, we appreciate the suggestions, however, our computer program was not designed to provide the type of data in the form you requested it.

We can provide the plant physicians with one or all four retrieval reports which contain the basic information you desire. Report No. 4 identifies all over-exposures, over-standards as well as below standards and prints them out in decreasing concentration and separated for TWA's and ceiling concentrations. We also have some short-term monitoring results but since July 1, 1976 we have pressed that personnel monitoring not be performed for short term (>15 minutes but < 4 hours).

We are still reviewing the raw data prior to key punching so as to assure that the data input is valid. There can be from 4 to 6 weeks lag between the date of sampling and entry into the computer.

* As you may recall, we have a monitoring worksheet which has two "block carbon" tear-offs. One of these is to be sent to the plant physician to keep him currently advised of any over-exposures or over-standards for VCM. It was understood that these reports would be maintained by the plant physician so that he may review them upon medical examination. Whether the physician has optioned to review and retain these I am not aware.

As per the number of representative samplings of employees in each job classification, we are in the process of including a section in the VCM work practice similar to the one in the VDCM work practice recently sent to the plants.

While I am not completely satisfied with the number of tests being performed, we must appreciate that there has been a great increased work load imposed upon the plants within the Chemical Division. We need additional personnel to further increase the coverage. I do feel that the Chemical Division is making significant progress in meeting these new or anticipated demands.

With reference to the usefulness of monitoring data on the action level for VCM, to the physician, all employees assigned to the VCM area are on our medical surveillance program irregardless of the monitoring results on action level concept, therefore, we are in compliance with the medical requirements set forth by the OSHA standards.

Could you please advise if any of the medical surveillance parameters we perform could reasonably be expected to reveal changes within a one year period at the concentrations revealed by our personnel monitoring tests?

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The usefulness of data on the percentage samples over the action level can be misleading since our monitoring program is to concentrate on more frequent sampling of workers as the monitoring results reveal increased exposures for that job class. This automatically introduces bias if percentage figures are computed.

We believe that monitoring data is most useful in identifying problem areas, operations and poor work practices. Our department makes recommendations to reduce or modify these exposures by engineering techniques. Repeated monitoring of workers after the cause of the exposure has been identified does not prevent future or subsequent exposure. Some corrective action must be formulated and this is being done.

You suggested that the over-exposure retrieval reports use red ink for ease of recognition. This is impossible since the computer printer has only monochromatic capabilities.

One comment about our computer program for monitoring data should be made,

We anticipated the need to have a program developed as rapidly as possible that would serve the industrial hygiene needs of the Chemical Division. We had to compromise some useful computer analyses of data before we were completely inundated with monitoring results.

Since July 1, 1976, we have 6123 test results stored in the computer. We have not gone back and key punched earlier test results since many of these results lack sufficient details to be interpretable or accepted by the computer.

Thanks for your interest and suggestions.

Zeb G. Bell, Jr.

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ZGB/fz

cc: F. C. Dehn
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