

INDUSTRIAL CHEMICALS DIVISION

MEMORANDUM

W. S. F.

October 2, 1974

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TO: Mr. P. N. Shellenberger

BRN

SUBJECT: OSHA Standards for VCM Exposure

1. The permanent OSHA VCM hygiene standard was released on October 1, 1974, as follows:

1 ppm time weighted 8-hour exposure.

5 ppm ceiling exposure during any 15 minute period.

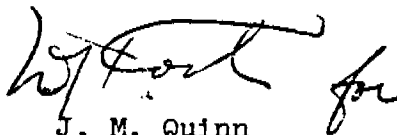
Generally, the ICD Baton Rouge North facilities will not present an overwhelming problem in regard to compliance with the announced OSHA standard. The standard is considerably lower and much more restrictive than anticipated but can be achieved by the facility with reservations as noted below. The new standard is to take effect on January 1, 1975, with the 50 ppm interim standard to remain in effect until that date.

2. While only a limited amount of exposure data is available, our experience indicates that problems are generally limited to periods of equipment outage for repair, clean out, shutdowns, minor leaks and spills, etc. Until such time as continuous monitoring (G.O. 65383; \$96,000) and abatement capital projects can be completed and since OSHA recognizes the use of protective masks as an interim measure, it may be necessary in specific areas and situations to set more stringent administrative controls on the use of masks. This will be required since VCM cannot be odor detected at such low levels. Enforcement of increased mask usage is expected to be a severe problem owing to the locale and extended periods of mask wearing, which may be necessary. Installation of the monitoring system should not be expected before 6-8 months from date of order. When functional, the monitor-alarm system will permit more judicious use of protective masks and compliance with the spirit of the new limits. Without continuous monitoring, we are unable to guarantee full compliance with a strict interpretation of the new standard.

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3. In a similar vein, emission limits for VCM should be expected from the Federal EPA in the near term. While we feel that our capital program anticipates environmental needs, we cannot, at this time, predict with confidence the adequacy of forecasted capital needs or project timing. Engineering and technical refinements are in progress on G.O. 65301, VCM vent recovery system. Estimates for completion of this as well as G.O. 65073, vent condensate recovery (heads column) during early 1975 would be extremely optimistic. More realistic completion dates would be mid 1975 and mid 1976, respectively. Current practices of flaring organics from vents and tank cars may also be given closer scrutiny by both State and Federal agencies.



J. M. Quinn
Director Environmental Services

/dl

cc: E. W. Callahan
W. S. Ferguson
A. J. von Frank
A. J. Lichota
E. E. James
R. S. Christian
H. W. Founds
P. B. Cornell
J. M. DeVoe

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