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LAKE CHARLES COMPLEX
INDUSTRIAL HYGIENE PROGRAM

STANDARDS COMPLIANCE MONITORING PLAN

This document addresses the minimum industrial hygiene sampling which Lake Charles is required to conduct under various OSHA Comprehensive Health Standards. It will be revised whenever either a new applicable standard is issued, or when an existing standard's revision affects the monitoring requirement.

I. OSHA 1910.1001 - Asbestos

A. OPERATIONS

1) Electrolyzers

(a) Personnel Monitoring *

- Cell Builder (May also be Renewal Man or Renewal Helper)
- TWA samples - 2 men, every 6 months
- Ceiling samples - 2 men--3 samples each during 1 day, every 6 months.

(b) Area Monitoring

- Processing Room between the glove boxes
- TWA sample, every 6 months
- Ceiling sample, during processing operations, every 6 months
- Processing Room at Asbestos Paper Cutting Station
- Ceiling sample, during cutting, every 6 months
- Processing Room at Dust Collection Return Air Plenum
- TWA sample, every 3 months

2) Area C Chlorine

(a) Personnel Monitoring *

- Glanor Renewal Man (may also be Renewal Helper)
same as 1.a, above
- Area Monitoring
same as 1.b, above

* Note: If any result exceeds the action level, a second follow-up sample shall be taken. If the result of the second test is also above the action level, the frequency shall be increased to monitoring every 3 months. If any result exceeds the IPEL and is similarly verified, the frequency shall be increased to monthly. Two successive samples below the IPEL or action level shall cause the monitoring frequency to be decreased to the next lower frequency. Further reduction may be done until the minimum of every 6 months is reached.

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B. MAINTENANCE

- 1) Personnel Monitoring
 - Insulators or other job titles during Asbestos insulation demolition
 - TWA sample, at least 1 man each time an identified asbestos job occurs.
- 2) Area Monitoring
 - Asbestos insulation demolition sites
 - TWA sample in immediate vicinity, each time an identified asbestos job occurs.

II. OSHA 1910.1017 Vinyl Chloride (Personnel Monitoring Only)

A. OPERATIONS *

- 1) Tri-Ethane II
 - (a) TE II Auxiliary Operator
 - TWA, every 3 months
 - (b) TE II Furnace Operator
 - TWA, every 6 months
- 2) VCM II
 - (a) Auxiliary Operator
 - TWA, every 3 months
 - STEL, every 3 months
 - (b) Furnace Operator
 - TWA, every 6 months
 - (c) Process Operator
 - TWA, every 3 months
 - STEL, every 6 months
 - (d) Storage Operator
 - TWA, every 6 months

B. MAINTENANCE (TE-II, VCM)

- 1) TE-II
 - Two job titles assigned to work in Tri-Ethane II Area
 - TWA, every 2 months
- 2) VCM II
 - Two job titles assigned to work in Vinyl Process Area
 - TWA, every 2 months

* Note: See Note, Page 1, concerning frequency of monitoring adjustments

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C. SHIPPING *

1) Tank Car Loading (VCM)

(a) Tankerman

- * TWA, every 6 months
- * STEL, while connecting/disconnecting cars - 2 samples/day
every 3 months

(b) Tankerman's Helper

- * TWA, every 6 months
- * STEL, while connecting/disconnecting cars - 2 samples/day
every 3 months

2) Docks Area (VCM)

(a) Tankerman

- * STEL, while loading barges, etc. - every 3 months

(b) Tankerman's Helper

- * STEL, while loading barges, etc. - every 3 months

* NOTE: See Note, Page 1, concerning frequency of monitoring adjustments

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