

Outline For
VCM Compliance Training
The Law 1910.93q

- (a) Scope and application
 - (1) Applies to: manufacture; reaction; packaging; storage; handling, or use of VCM
 - (2) Does not apply to use of fabricated PVC
- (b) Definition
 - (1) Action Level - VCM concentration of 0.5 ppm averaged over an 8-hour work day.
 - (2) Emergency - has been generally interpreted by the industry as a massive VCM release. Such as: tank rupture; manhead gasket failure; relief valve operation.
 - (3) Hazardous operations - any operation where an accident could cause a VCM exposure in excess of the permissible exposure limit.
- (c) Permissible exposure limit
 - (1) No exposure to greater than 1 ppm average over any 8-hour period
 - (2) No exposure to greater than 5 ppm over any period not exceeding 15 minutes
- (d) Monitoring
 - (1) Each employee working in an area above the "permissible level" will be monitored monthly; where above the "action level" quarterly.
 - (2) May be discontinued where two consecutive measurements, at least 5 days apart, are below the "action level".
 - (3) Employees have the right to observe monitoring
- (e) Regulated Area - any area where VCM concentrations are above the permissible limit
 - (1) Access to regulated areas is limited to authorized persons
 - (2) A daily roster is kept of persons entering regulated areas.
- (f) Methods of compliance - employee exposure shall be controlled at or below the permissible level by:
 - (1) Engineering
 - (2) Work practice
 - (3) Personal protective equipment, respirators
- (g) Respirator Protections
 - (1) The employer will provide respirators
 - (2) Until ~~1997.9~~ 319.76.9 The Employees have the option not to wear respirators up to 25 ppm of VCM
 - (A) The Company will obtain a release from employees choosing not to wear respirators under 25 ppm.
 - (B) People choosing not to wear respirators will be retrained quarterly
 - (3) NIOSH approved respirators
 - (A) Unknown or above 3,600 ppm - pressure demand self-contained breathing apparatus; Scott Pac.
 - (B) Not over 3,600 ppm - supplied air line mask with auxiliary self-contained supply.

- (C) Not over 1,000 ppm - supplied air line mask.
- (4) Concentrations between 3,600 and 36,000 may be extended only for:
 - (A) Life rescue
 - (B) Fire fighting
 - (C) Securing equipment
- (5) Concentrations greater than 36,000 ppm may be extended for life rescue or securing equipment that immediately threatens life
- (6) A continuous monitoring system will alarm at 25 ppm
- (h) Hazardous Operations - employee working in areas where an accident could result in an exposure greater than the permissible limit will:
 - (1) Wear respirator protection as required
 - (2) Wear protective clothing where there is a chance of contact with liquid VCM or residual PVC.
- (i) Emergency Situations
 - (1) Company must have a written plan covering emergencies
 - (A) Employees correcting emergency must be equipped with respirators and protective clothing as required.
 - (B) All other employees must leave the area.
- (j) Training - all employees engaged in VCM and PVC operations must be given training on the hazards and precautions for its safe use, including:
 - (1) Respirators
 - (2) Fire hazard and toxicity
 - (3) Description of monitoring
 - (4) Description of medical surveillance
 - (5) Emergency procedures
 - (6) Recognition of conditions which may result in VCM release.
 - (7) Review of the VCM standard
- (k) Medical Surveillance - the company must provide medical exams:
 - (1) Yearly for all employees exposed over the action level.
 - (2) Every 6 months for people employed over 10 years.
 - (3) After a VCM exposure during an emergency
 - (4) Copies of the results will be given each employee.
- (l) Signs and Labels - regulated areas, hazardous operations, PVC waste containers, PVC containers, and VCM containers must have a sign or label as provided by the law.
- (m) Records - the company must retain records on:
 - (1) Monitoring
 - (2) Medical surveillance
 - (3) Rosters
- (n) Report
 - (1) The company must report regulated areas and emergencies to the government
 - (2) Results of monitoring in excess of the permissible limit are reported to the employee exposed.

- O. Medical Surveillance - A medical study of each employee performed by or under the supervision of a licensed physician.
- P. Signs & Labels - To identify regulated areas as Emergency or Hazardous.