

~~TGG:AC:EL:VE:AP:RF~~
XF 392

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TO: Distribution

FROM: V. E. Messick
DATE: August 3, 1993

SUBJECT: OSHA VCM Reporting Guidelines

VISTA

Interoffice
Communication

Attached is past correspondence relating to reporting guidelines for VCM under the OSHA standard. The March 4, 1985 letter from TGG and WLM is the most recent guidance given on this subject. TGG suggested that we begin with this document and try to achieve consistent guidelines in the plants. This guideline would then be used to update plant reporting protocols and be used in training.

I will schedule a conference call to discuss.



V. E. Messick
Director, Safety, Health & Environmental
Olefins and Vinyl Division

/mb

Attachment

Distribution:

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VEV-151736

File 392

To → ~~Docum~~
~~2-11-81~~

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APR 3 1987
DR. R. T. GOTTESMAN

April 1, 1987

James W. Kachtick
Occidental Chemical Corporation
Post Office Box 849
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Re: OSHA Definition of Massive Release

Dear Jim:

At the March 12 meeting of the Health, Safety and Environment Committee of the Vinyl Institute, you requested information concerning how the Occupational Safety and Health Administration (OSHA) defines the term "massive release" under its vinyl chloride standard. 29 C.F.R. § 1910.1017. As discussed more thoroughly below, a concentration of vinyl chloride greater than 100 parts per million (ppm) is normally considered a "massive release" under the OSHA standard.

The OSHA vinyl chloride standard defines the term "emergency" as situations likely to result in the "massive release" of vinyl chloride. 29 C.F.R. § 1910.1017(b)(5). OSHA presented its interpretation of massive release in Program Directive No. 200-35, p. 3, where it stated:

'Massive release' refers to an unexpected release of vinyl chloride. The term would apply to any operation or place where the concentration of VC is greater than 100 ppm. To specify, a pipe breakage might cause massive release, whereas a pipe leak might release only a small amount of VC and therefore not be considered a massive release. Also heat sealing, such as meat wrapping, would not be expected to cause massive release.

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James W. Kachtick
April 1, 1987
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This interpretation has been relied upon in at least one case before the Occupational Safety and Health Review Commission. Secretary of Labor v. Air Products & Chemicals, Inc., OSHRC Docket No. 76-0150 (March 28, 1977) (see pp. 15-16 of Opinion). Copies of the OSHA Directive and the decision are enclosed.

In 1978, OSHA redesignated Program Directive 200-35 as Instruction CPL 2-2.4. When it revised the Field Operations Manual (FOM) it cancelled the earlier vinyl chloride documents. OSHA Notice CPL 2 (July 16, 1984). In theory, the vinyl chloride guidelines were incorporated into the revised FOM. In actuality, the FOM contains no guidance on the term massive release and the cancelled materials provide the only existing guidelines in the area.

I trust that this will be an adequate response to your request. If you have any comments or questions or if I can be of any assistance, please call me.

Cordially yours,



Peter L. de la Cruz

Enclosure

cc: W.C. Holbrook (w/o encs.)
Robert D. Luss, Esq. (w/o encs.)
✓ Roy T. Gottesman, Ph.D. (w/o encs.)
Charles E. O'Connell (w/o encs.)
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