


CONOCO

Interoffice Communication

To D. A. Kuhn
From C. E. Gremillion
Date January 7, 1976
Subject OSHA Visit - VCM Regulations

On January 2, 1976 at 9:30 am, Messrs. Larry Durio and Stephen Missinger, Industrial Hygienists with the Occupational Safety and Health Administration, Region VI, from Baton Rouge, La. arrived at the plant in regard to our reported emergency VCM condition on December 30, 1975. They stated they were here to investigate the details surrounding our reported incident. Mr. J. A. DeBernardi and myself met with the men until 3:00 pm the same day.

The compliance officers asked questions regarding the details involved in the reported accidental and unexpected release. They then requested to look at our general industry records (OSHA forms 101, 100 & 102). They did not request to review our VCM records.

Larry Durio questioned me about our safety program; how organized, first aid training, safety meetings, safety procedures and rules, etc. In addition, Mr. Durio asked general questions regarding our plant process, number of employees and locations of the regulated areas in the plant and the number of employees normally working in the areas where the release occurred.

The officers stated they wanted to investigate the location of the release and talk to a few of the employees exposed to VCM, take pictures and obtain written statements from them. Written statements were given by J. A. DeBernardi, R. Fox and C. E. Gremillion. The other men exposed were not available for written statements. Larry Durio assured us that since the plant's design and operation was proprietary in nature the pictures taken would be held in strict confidence and not divulged to any outside parties.

An inspection was made of the location where the accidental release occurred. J. A. DeBernardi, C. E. Gremillion and P. L. Fetzer accompanied the officers on the inspection. Pictures and samples were taken by the compliance officers. The officers used a Bendix Gastec Detector Tube sampling instrument. We used the same type of Bendix Detector Tube and the Sipin dosimeter pump. We took our samples concurrent with their samples. The results of this sampling is outlined on attachment A. The inspection consisted only of the immediate area around where personnel were exposed near the vent stack. Sampling points were selected based where personnel were located at the time of the release.

The compliance officers met with R. Fox, chief operator, approximately 2:00 pm to interview him regarding his description of the release.

At the exit interview, Mr. Durio indicated there might be a citation issued for failure to have the employees controlling the VCM release to wear respiratory

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protection during the alleged emergency period. When asked what specific paragraph might we be cited under, Mr. Durio frankly did not know. I commented since no exact VCM concentration measurement was taken during the time and the length of exposure was not determined (exposure was estimated to be 10-15 seconds) how could we have violated the standard. Mr. Durio stated the standard was ambiguous and a discussion with his Area Director was necessary to determine what action, if any, would be taken.

Both compliance officers were M.S. graduates in Industrial Hygiene. However, they appeared to lack practical experience in chemical plants. They were fairly knowledgeable with the VCM standards per se, but appeared quite ignorant with respect to the practical application of the standard. For example, there were not aware they were required to sign-out when they left the regulated area.


C. E. Gremillion
Safety Director

bw

Distribution

J. A. DeBernardi
R. D. Gamblin
R. E. Lehmkuhl
C. H. Klunick
J. Friend
P. L. Fetzner
J. H. McCulley

ATTACHMENT A

Sampling Instrument	OSHA RESULTS			VCM PLANT RESULTS		
	South Loading Rack - East of Shack	South East of Vent Stack	West Side of T-411C Sphere on Dike	South Loading Rack East of Shack	South East of Vent Stack	West Side of T-411C Sphere on Dike
*Bendix Gastec Detector Tube VCM - 0-14ppm	Pump Strokes-4 0ppm	Pump Strokes-8 2.2ppm	Pump Strokes-8 1.0ppm	Pump Strokes-4 0ppm	Pump Strokes-8 1.75ppm	Pump Strokes-8 0.75ppm
Sipin SP-3 Dosimeter Pump 15 min. Sample	-	-	-	Nil	Nil	Nil

OSHA PICTURES TAKEN

**Picture No.	Time	Location	Direction Facing
3	12:10 pm	Area showing roadway between loading rack and loading pumps, deluge system and vent stack.	West
4	12:12 pm	Area showing south loading rack including steps leading to rack from east end.	West
5	12:32 pm	Area showing VCM vent stack area taken from south loading rack shack.	North
6	12:52 pm	Area taken within 25 ft. of vent stack at ground level.	West
7	1:10 am	Area showing dike area west of T-411C sphere and east of vent recovery unit.	South

Weather Conditions: Partly cloudy, wind from south at 20 mph, 87% relative humidity with 72°F temperature.

*Accuracy is based on ±35% instrument error.

**Pictures numbered according to OSHA film

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