

CRITIQUE OF PROPOSED OSHA PERMANENT STANDARD ON VINYL CHLORIDE

1910.93g Vinyl Chloride

§ 1910.93g Vinyl Chloride.

→ (a) *Scope and application.* (1) This section applies to any area or operation in which vinyl chloride (chloroethene), Chemical Abstracts Service Registry No. 75015, is manufactured, reacted, released, repackaged, stored, or used, including areas and operations involving polyvinyl chloride where detectable levels of vinyl chloride are released.

(2) This section does not apply to the handling or use of fabricated products made entirely or in part of polyvinyl chloride.

(b) *Definitions.* (1) "Assistant Secretary" means the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor or his designee.

(2) "Authorized employee" means an employee whose duties require him to be in the regulated area and who has been specifically assigned by the employer; and any employee who enters such an area as a designated representative of employees to exercise an opportunity to observe monitoring and measuring of vinyl chloride.

(3) "Closed container" means any container which prevents the release of vinyl chloride to the environment.

(4) "Contaminated" means capable of releasing a detectable level of vinyl chloride.

(5) "Decontamination" means reduction of vinyl chloride concentrations to less than detectable levels.

(6) "Detectable level" means an airborne concentration of vinyl chloride measurable by a sampling and analytical method capable of measuring concentrations of 1 ppm, with an accuracy of 1 ppm $\pm$ 50 percent.

(7) "Director" means the Director, National Institute for Occupational Safety and Health, or any person directed by him or the Secretary of Health, Education, and Welfare to act for the Director.

(8) "Emergency" means an unforeseen circumstance or set of circumstances, resulting in the release of vinyl chloride into areas occupied by employees.

(a) Scope and application.

- (1) We feel that the scope and application of this proposed standard should be divided into three parts: that associated with the manufacture of vinyl chloride monomer, the practices associated with the manufacture of PVC resin or copolymers and the third part would be the fabricators of this resin into vinyl products.

(b) Definitions.

- (1) No comment.
- (2) No comment.
- (3) "Closed container" means any portable waste container which prevents the release of vinyl chloride to the work place in excess of the permissible level.
- (4) "Contaminated" means capable of releasing vinyl chloride into the work place atmosphere at levels which are in excess of the permissible level.
- (5) "Decontamination" means reducing vinyl chloride concentrations in the work place atmosphere to levels which are in excess of the permissible level.
- (6) "Permissible level" means work place airborne concentrations of vinyl chloride with a time weighted average value and ceiling concentrations as defined in the following schedule.
- (7) No comment.
- (8) "Emergency" means an unforeseen circumstance or set of circumstances resulting in the release of vinyl chloride into areas which results in employee exposure to VCM in excess of the above the permissible level. SL 074311

(9) "Exposure" means actual contact with vinyl chloride when unprotected by required personal protective equipment and clothing.

(10) "Fabricated product" means a finished product or part of such product, made of polyvinyl chloride, entirely or in part, including semifinished products such as film, sheet, block, bar, or extrusion stock.

(11) "OSHA Area Director" means the Director for the Occupational Safety and Health Administration Area Office having jurisdiction over the geographic area in which the establishment is located.

(12) "Polyvinyl chloride" means polyvinyl chloride homopolymer or copolymer before such is converted to a fabricated product.

(13) "Protective clothing" means clothing protective against vinyl chloride.

(14) "Vinyl chloride" means vinyl chloride monomer.

(15) "Waste resin" means any resin or other reaction products removed in the cleaning of equipment, such as vessels and piping.

(c) Reference. College of American Pathologists, 230 N. Michigan Ave., Chicago, Illinois 60601.

(d) ~~Regulated areas.~~ (1) A regulated area shall be established where (i) vinyl chloride is manufactured, reacted, released, repackaged, stored, or used; or (ii) polyvinyl chloride capable of releasing detectable levels of vinyl chloride is manufactured, reacted, released, repackaged, stored, or used.

(2) ~~Regulated areas shall be limited to authorized employees.~~

(3) A daily roster of employees entering regulated areas shall be made and maintained. The rosters, or summaries thereof, shall be kept for at least 20 years.

(9) "Exposure" means inhalation of vinyl chloride in excess of the permissible level.

(10) No comment.

(11) No comment.

(12) No comment.

(13) "Protective clothing" means clothing required for protection of personnel when exposure to vinyl chloride contaminated liquid is possible. There is no evidence to indicate that exposure to vinyl chloride vapors is harmful.

(14) No comment

(15) No comment.

(c) Reference.

No comment.

(d) Regulated areas.

(1) A regulated area in a monomer plant shall be established where vinyl chloride concentrations in excess of the permissible level.

(2) No comment.

(3) We recommend that a record, not a daily roster be kept on employees entering regulated areas and that this roster be kept only on employees assigned to regulated areas.

(e) Monitoring.

(1) Every regulated area shall be monitored for detectable levels of vinyl chloride.

(2) The monitoring shall assure that any exposure may be determined for each authorized employee with a confidence level of 95 percent.

(3) Employees or their designated representatives shall be afforded an opportunity to observe monitoring and measuring required by this paragraph.

(i) Where exercise of an opportunity requires entry to an area where the use

of protective clothing, equipment, facilities, or procedures is required, such clothing, equipment, facilities, and procedures shall be provided to all persons entitled to exercise the opportunity, at no cost to any of them.

(ii) Persons exercising the opportunity shall be instructed regarding:

(A) The toxicity and fire hazard of vinyl chloride; and

(B) The protective steps and measures necessary for their protection.

(iii) Observers shall be permitted, without interference to the persons performing the monitoring and measuring, to:

(A) Observe all steps and procedures related to the collecting, processing, and evaluation of particular monitoring and measurement samples;

(B) Record quantities and results obtained;

(C) Observe the condition of monitoring and measuring equipment;

(D) Receive a demonstration of the calibration and function tests of the monitoring and measuring equipment performed on site; and

(E) Examine instructions and documents related to the procedures and equipment for monitoring and measuring.

(4) Accurate and complete records of all required monitoring shall be made and maintained for not less than 20 years. Such a record shall (i) state the date of such monitoring and the levels determined; and (ii) identify the instruments and methods used.

(1) Every regulated area shall be monitored for compliance within the permissible levels.

(2) We are critical of the 95 percent confidence level because we feel statistically this is not attainable and we will have an argument to this affect attached in our critique. We would suggest that the monitoring shall be adequate to insure reasonable definition of employee exposure.

(3) Employee representatives must be qualified; that is, they must be either part of the bargaining unit or a federal representative of a federal agency. We also feel it is important for us to instruct all employees in regulated areas as to the monitoring procedures which will be used.

(4) We recommend that only summary records or facimilies be retained, not individual data sheets for the 20 year period specified.

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(f) Engineering controls and work practice methods.

(1) Engineering controls and workpractice methods. (1) Where detectable levels of vinyl chloride are measured, immediate protection shall be provided against exposure to vinyl chloride by the use of engineering controls, workpractice methods, and respirators as follows:

- (1) Where work place levels of vinyl chloride in excess of the permissible level are measured, immediate protection shall be provided against exposure to vinyl chloride by the use of engineering controls on existing equipment, work practice methods and suitable respiratory protection as follows:

(i) Add "engineering controls shall be

installed" in work practices methods.

(1) Feasible engineering controls and workpractice methods shall immediately be used to reduce airborne concentrations of vinyl chloride below the detectable level;

- (ii) Should be consistent with the permissible level.

(ii) Wherever feasible engineering controls and workpractice methods which can be instituted immediately are not sufficient to reduce concentrations of vinyl chloride below the detectable level, they shall nonetheless be used to reduce the concentrations to the lowest practicable level, and shall be supplemented by means of respirators in accordance with paragraph (g) of this section;

- (iii) Should be consistent with the permissible level.

(iii) Wherever no feasible engineering control or workpractice method can be instituted immediately, immediate respiratory protection shall be provided in accordance with paragraph (g) of this section; and

- (iv) Should be consistent with permissible level

(iv) In any case covered by paragraph (i) (1) (ii) or (iii) of this section, the employer shall also undertake as soon as practicable a program to reduce airborne concentrations of vinyl chloride below the detectable level, or to the greatest extent feasible, solely by means of engineering controls and workpractice methods and as soon as feasible.

- (2) No comment.

(2) There shall be tests made for process or equipment leaks and for emission of vinyl chloride which may result from workpractices. The frequency of these tests shall be such as to insure the integrity of equipment and adherence to proper workpractices.

(g) *Respiratory protection.* (1) A respiratory protection program in accordance with § 1910.134 shall be established and implemented where respirators are required to be used by this section.

(2) Respirators shall be used only in cases of emergency and where required by any other provision of this section. Respirators may not be used in lieu of feasible engineering controls or work-practice methods.

(3) Respirators or combinations of respirators for protection against vinyl chloride shall be selected from among the following:

(i) A positive pressure full facepiece self-contained breathing apparatus;

(ii) A pressure-demand full facepiece self-contained breathing apparatus operating in the pressure-demand mode;

(iii) A combination type "C" pressure-demand full facepiece respirator operating in the pressure-demand mode and a pressure-demand self-contained breathing apparatus operating in the pressure-demand mode; or

(iv) A combination type "C" continuous flow respirator and a pressure-demand self-contained breathing apparatus operating in the pressure-demand mode.

(h) *Protective clothing.* (1) Employees entering regulated areas shall be provided full-body protective clothing, footwear or shoe covers, and gloves, at no cost to them, and required to wear it while in the regulated area.

(2) Where polyvinyl chloride powder containing detectable levels of vinyl chloride is handled, employees shall also be:

(i) Provided and required to wear headcoverings;

(ii) Required to remove all protective clothing at each exit from the regulated area; and

(iii) Required to shower after the last exit of the day.

(3) Clean protective clothing shall be provided whenever contaminated or soiled, but not less frequently than weekly. Contaminated clothing shall be decontaminated before reuse by removal for laundering or disposal.

(i) *Hygiene facilities and practices.*

(1) Where employees are required by this section to wear protective clothing and equipment, change rooms shall be provided in accordance with § 1910.141(e).

(2) Where employees are required by this section to shower, shower facilities shall be provided in accordance with § 1910.141(d)(3).

(3) Storage or consumption of food or beverages, storage or use of smoking or non-food chewing products, and the use or application of cosmetics are prohibited in regulated areas.

(g) Respiratory protection.

Respiratory protection for vinyl chloride monomer production shall be provided according to the following schedule:

Below Permissible Level - Approved chemical cartridge respirators will be available but not required.

Up to 50 ppm - Approved chemical cartridge respirators will be used.

50 ppm or greater - airline half-masks or suitable self-contained breathing apparatus will be required.

(h) Protective clothing.

It is our opinion that protective clothing is required only when liquid VCM or liquid contaminated with vinyl chloride is in danger of coming in contact with the worker's skin. There is no special protective clothing required for VCM vapor exposure.

(i) Hygiene facilities and practices.

Because of the physical properties of vinyl chloride (a gas at ambient conditions), the need for shower is only required when clothing is contaminated and retains liquid contaminated with vinyl chloride. Showering may be required for employees involved in emergency situations where gross vinyl chloride could be present. It is not required to provide change of

clothes or special clothing for operators in regulated areas during normal working conditions. Comments concerning storage and consumption of food and beverages is agreeable and consistent with PPG present plant practices.

(j) *Emergency situations.* (1) A written operational plan for emergency situations shall be developed for each regulated area.

(j) Emergency situations.

(1) No comment.

(2) In the event of an emergency, appropriate portions of the plan shall be put into operation.

(2) No comment.

(i) Hazardous conditions created by the emergency shall be eliminated and the affected area shall be decontaminated prior to the resumption of normal operations.

(i) Eliminate decontamination phrase - has no meaning.

(ii) Special medical surveillance by a physician shall be instituted within 24-hours for employees present in the affected area at the time of the emergency.

(ii) The need for special medical surveillance is not required due to the fact that there is no medical

treatment for acute exposure to vinyl chloride

unless the exposure manifests itself in unconsciousness or frostbite.

Where an employee has a known contact with liquid vinyl chloride such employee shall be required to shower as soon as possible, unless contraindicated by physical injuries.

(iii) Would be consistent with our statement on showering which was covered in (h) concerning retained liquid contaminated with vinyl chloride.

(iv) An incident report on the emergency shall be reported as required in paragraph (q) (2) of this section.

(iv) Rewrite to an incident record on the emergency shall be reported.

(3) Each authorized employee shall be trained in a program relating to the hazards of vinyl chloride and the precautions for safe use.

(i) The program shall include:

(A) The nature of the fire hazard, and the necessary protective steps;

(B) The nature of the toxic hazard, including local and systemic effects, acute and chronic effects including specifically the carcinogenic hazard;

(C) The specific nature of operations which could result in exposure to vinyl chloride, and necessary protective steps;

(D) The purpose for and application of the medical surveillance program;

(E) The purpose for and application of decontamination practices;

(F) The purpose for and significance of emergency practices and procedures;

(G) The employee's specific role under normal operating or emergency conditions;

(H) Specific information to aid the employee in recognition and evaluation of conditions and situations which may result in the release of vinyl chloride;

(I) The purpose for and application of specific first aid procedures and practices;

(J) A review of this standard at the employee's first training and indoctrination program and annually thereafter.

(ii) All materials relating to the program shall be provided upon request to authorized representatives of the Assistant Secretary and the Director.

(k) Signs and labels. (1) Entrances to regulated areas shall be posted with signs bearing the legend:

CANCER-SUSPECT AGENT AREA
AUTHORIZED PERSONNEL ONLY

(2) Areas containing operations covered in paragraph (k) (1) (4) of this section shall be posted with signs bearing the legend:

CANCER-SUSPECT AGENT IN THIS AREA
FULL IMPERVIOUS AIR-SUPPLIED EQUIP-
MENT REQUIRED
AUTHORIZED PERSONNEL ONLY

(3) Containers of waste or other materials contaminated with vinyl chloride shall be labeled:

VINYL CHLORIDE CONTAMINATED
MATERIAL
CANCER-SUSPECT AGENT
DISPOSE OF OR DECONTAMINATE USING
AUTHORIZED PROCEDURES

(4) Containers of polyvinyl chloride containing detectable levels of vinyl chloride shall be labeled:

POLYVINYL CHLORIDE
CONTAINS VINYL CHLORIDE
VINYL CHLORIDE IS A
CANCER-SUSPECT AGENT
ABSORBED BY BREATHING AND
THROUGH SKIN

(3) No comments on the various sub-parts of this group.

(k) Signs and labels.

(1) No comment.

(2) Change wording in second statement to "full impervious air-supplied equipment may be required"

(3) No comment.

(4) No comment - PVC practice.

(5) Containers of vinyl chloride shall be labeled:

VINYL CHLORIDE
DANGER
EXTREMELY FLAMMABLE GAS
UNDER PRESSURE
MAY POLYMERIZE WITH
EXPLOSIVE FORCE
POISON
CANCER SUSPECT AGENT AND
ANESTHETIC
ABSORBED BY BREATHING
AND THROUGH SKIN

(6) No statement shall appear on or near any required sign, label or instruction, which contradicts or detracts from the effect of any required warning, information or instruction.

(1) Maintenance and decontamination. (1) Emphasis shall be placed upon immediate clean up of spills, periodic inspection, prompt repair of equipment and leaks, and proper handling, storage and disposal or decontamination of materials to prevent airborne contamination and accidental skin contact with vinyl chloride. Waste materials, equipment, and other sources of vinyl chloride in closed containers, may not be placed in areas of excessive temperature or sunlight since build-up of internal pressure may result in rupture of the container, fire or explosion.

(2) Waste resins or other materials contaminated with vinyl chloride shall be placed in closed containers pending disposal or decontamination.

(3) Appropriate procedures shall be developed and implemented for the decontamination or disposal of all such waste material.

(5) Eliminate "may polymerize with explosive force" since this has not been substantiated. Eliminate the word "poison" since by definition, vinyl chloride is not a poison. Eliminate the last statement "absorbed by breathing and through skin" and replace it with "do not breathe vapors".

(6) No comment.

(1) Maintenance and decontamination.

(1) It should be emphasized that immediate clean up of spills, refers to liquid which may be contaminated with vinyl chloride. Pure vinyl chloride would not remain as a liquid for any extended period of time. We also recommend that instead of the words "prevent airborne contamination" we change to "minimize airborne contamination" with vinyl chloride. In second sentence should be noted parenthetically that under the strict definition of the sentence, it would be impossible to ship vinyl chloride in containers, tank cars or barges, or tank trucks. We don't believe this is the intent of that statement.

(2) No comment.

(3) Rewrite - Appropriate procedures shall be developed and implemented for the protection of the worker during decontamination and disposal of waste material.

(4) In maintenance or repair operations on contaminated systems or equipment, including vessel entry, employees engaged in such operations shall be (i) provided with and required to wear and use a whole-body air-supplied suit impervious to vinyl chloride, and a respirator in accordance with paragraph (2) of this section; and

(4)

(i) Where employees are engaged in cleaning and maintenance operations inside vessels with VCM concentrations below 50 ppm, approved cartridge respiratory protection shall be used. In maintenance operations where the VCM concentration cannot be reduced below 50 ppm, approved air supplied breathing apparatus will be used. Protective clothing will be required only when contaminated liquid is present.

(ii) required to shower after removing protective equipment.

(ii) Shower facilities will be available to employees after use of protective clothing.

(5) Protective clothing and equipment be clean and dry for each use.

(5) Impervious special protective clothing and equipment shall be clean and dry for each use.

(6) When vessels or piping systems are opened local exhaust ventilation shall be provided to remove the escaping vapor from all occupied areas.

(6) When vessels or piping systems are opened, adequate ventilation shall be provided to maintain VCM concentration within permissible levels.

(7) (i) Vessels to be entered shall first be ventilated and monitored so that the concentration of vinyl chloride is reduced to a level within the protection factor capability of the protective equipment.

(7) (i) No comment.

(ii) When vessels are to be entered, all piping to such vessel shall be:
(A) Opened, blanked and tagged; or
(B) Where welded piping is in use, not less than 2 valves in series, which isolate the vessel from any other connection to such line, must be closed and secured.

(ii) No comment.

(iii) No employee shall enter a vessel, except when another employee properly trained and equipped for entry is present and is observing the employee in the vessel. The observer shall have means of signalling for help in the event the employee experiences problems. Under such conditions, the observer shall signal for help and shall not enter to assist the employee until another person is present to observe.

(iii) Eliminate the last sentence which says "Under such conditions, the observer shall signal"

Transportation loading and unloading. (1) Facilities for the loading and unloading of vinyl chloride to and from containers shall have each transfer line and vapor-equalizing line equipped with vent connections, and shall have an inert gas purging system. Vent and purge effluent shall be returned to a process stream or flared in a safe location.

(2) Procedures shall be developed and implemented for the transfer of vinyl chloride. Written copies of such procedures shall be provided employees engaged in such operations, and such employees shall be fully trained and rehearsed in all procedures.

(3) Employees engaged in transfer operations shall be provided with and required to wear respirators in accordance with paragraph (g) of this section.

Polymer handling operations. (1) Containers of polyvinyl chloride releasing detectable levels of vinyl chloride shall be opened and transferred only under local exhaust ventilation which reduces the concentration of vinyl chloride below the detectable level.

(2) Hot operations, such as but not limited to milling, calendaring and extruding, which release detectable levels of vinyl chloride, shall be carried on only under local exhaust ventilation which reduces the concentration of vinyl chloride below the detectable level.

Medical surveillance. Not later than 1974, a program of medical surveillance shall be instituted, and shall provide each authorized employee with an opportunity for examinations in accordance with this paragraph. All medical examinations and procedures shall be performed by or under the supervision of a licensed doctor of Medicine (MD) or Doctor of Osteopathy (DO). All medical examinations and tests shall be provided without cost to the employee.

(1) At the time of initial employment, or upon institution of screening, a physical examination shall be performed with attention to detecting enlargement of liver or spleen by abdominal palpation.

(2) At the time of initial employment or institution of screening, and thereafter, a medical history shall be completed by the employee. This list shall include questions concerning:

(m) Transportation loading and unloading.

(1) This statement should be modified to indicate that vent and purge lines associated with the process shall be returned to the process system where possible or vented to suitable areas to prevent the exposure of workers to hazardous concentrations of vinyl chloride.

(2) No comment.

(3) Should be consistent with the provisions in (g) and should refer to loading and unloading operations, not "transfers".

(n) Polymer handling operations.

No comments are made since this is not part of a monomer plant operation; however, the recommendations under this heading should be consistent with the rest of our proposed recommendations.

(o) Medical surveillance.

Basically, the comments concerned in the medical surveillance section are acceptable except for the following items.

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- (i) Alcohol intake;
 - (ii) Past history of hepatitis;
 - (iii) Past exposure to potential hepatotoxic agents, including drugs and chemicals;
 - (iv) Past history of blood transfusions; and
 - (v) Past history of hospitalizations.
- (3) At the time of initial employment, or upon institution of screening, a serum specimen shall be obtained for screening with respect to the following biochemical determinations of liver function:
- (i) Total bilirubin;
 - (ii) Alkaline phosphatase;
 - (iii) Serum glutamic oxalacetic transaminase (SGOT);
 - (iv) Serum glutamic pyruvic transaminase (SGPT); and
 - (v) Gamma glutamyl transpeptidase (GGTP).
- (4) Additional tests that may optionally be considered for use in screening include:
- (i) Lactic dehydrogenase;
 - (ii) Serum protein determinations;
 - (iii) Serum protein electrophoresis;
- and
- (iv) Platelet count.
- (5) Laboratory analyses for all biological specimens included in medical examinations shall be performed in laboratories accredited by the College of American Pathologists or licensed under 43 CFR Part 74.
- (6) If the results of screening required in paragraph (b)(3) of this section are normal, screening shall be repeated:
- (i) Every six months for employees who have been employed in vinyl chloride related operations for 10 years or more; and
 - (ii) Annually for all other employees entering regulated areas.
- (7) If one or more liver function tests performed are abnormal, serum testing shall be repeated as soon as possible, preferably within two to four weeks. If no abnormalities are present upon re-screening, serum testing shall be repeated in three months.

(8) If abnormalities persist upon re-screening, the employee shall be withdrawn from areas where contact with vinyl chloride is possible, and an individualized medical workshop shall be instituted. Suggested as initial steps are a complete physical examination and various special procedures such as hepatitis B antigen determination and liver scanning. If liver function abnormalities are determined to be unrelated to liver disease, the employee may be permitted to return to vinyl chloride-related employment, subject to individual medical evaluation.

(9) A complete and accurate record of results of medical examinations shall be made and maintained for the duration of employment plus five years, or for 20 years, whichever is longer.

(6)

(i) Rather than have the screening repeated every six months, we would recommend that this be an annual screening which is what we do at the present time at our plants.

(7) Modify the definition of liver abnormalities to state that one abnormality in employees with over ten years exposure should be sufficient to warrant repeating the serum testing and for workers with less than ten years, two abnormal liver tests are required before repeats are necessary.

(8) Employees shall be withdrawn from areas where contact with vinyl chloride is probable.

(p) Records. (1) Records of monitoring and measuring, medical records, and related area entry rosters and summaries, shall be made available for examination and copying upon request to authorized representatives of the Assistant Secretary and the Director.

(2) In the event that the employer ceases to do business and there is no successor to receive and retain his records for the prescribed period, these records shall be transmitted by registered mail to the Director, and each employee individually notified in writing of this transfer.

(3) Employees and their designated representatives shall be provided access to examine and copy records of monitoring and measuring.

(4) Former employees shall be provided access to examine and copy records reflecting their own exposures.

(5) Upon written request of any employee, a copy of the medical record of such employee shall be furnished to a physician designated by the employee in such request.

(p) Records

(1) Medical records can be reviewed only by medical personnel and not by the Department of Labor representatives. Records should be of summary in nature rather than having each detail log sheet.

(2) No comment.

(3) Each employee or his designated representative shall have access to his own records on occupational exposure.

(4) Insert ... own "individual" exposures.

(5) Should be rewritten more specifically and state "Upon written request of any employee, a copy of his own medical record shall be furnished to a physician designated by him in such a request."

(q) Reports. (1) Not later than ----- the following information shall be reported to the OSHA Area Director. Change in such information shall be reported to the OSHA Area Director within 15 days of such change.

(i) The address and location of each establishment which has one or more regulated areas; and

(ii) The number of employees in each regulated area during normal operations, including maintenance.

(2) Incidents which result in the release of vinyl chloride into any area where employees may be exposed shall be reported in accordance with this paragraph.

(i) A report of the occurrence of the incident and the facts obtainable at that time including a report on any medical treatment of affected employees shall be made within 24 hours to the OSHA Area Director.

(q) Reports.

(1) No comment.

(ii) The total number of employees in regulated areas during normal operations.

(2) Change the word "incident" to "emergencies" and specify that the emergency is a case in which employees were exposed to vinyl chloride in concentrations greater than defined by the permissible level.

(i) Recommend that OSHA be consistent with their own practices in the Act which requires notification in case of fatality or injury to five or more people within 48 hours. We see no reason for notification of the Area Director within 24 hours of any vinyl chloride mishap, for an exposure that everyone believes requires long laden periods to result in any harmful effects. The 24 hour notice seems rather quick and unnecessary and should be deleted.

(ii) Instead of 15 days, the report shall be filed with OSHA within 30 calendar days.

(ii) A written report shall be filed with the OSHA Area Director within 15 calendar days thereafter and shall include:

(A) A specification of the amount of material released:

(B) A description of the area involved and the extent of known and potential employee exposure and area affected:

(A) An estimate of the amount of vinyl chloride released should be made. We need to be specific here that we want to report vinyl chloride, not inert material.

(B) No comment.

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A report on any medical treatment of affected employees and any medical surveillance program implemented; and

(D) An analysis of the circumstances of the incident, and measures taken or to be taken, with specific completion dates, to avoid further similar releases.

(3) Upon completion of any monitoring and measuring which discloses that any employee has actually been exposed to detectable levels of vinyl chloride, each such employee shall be individually notified in writing. The notice shall:

(i) Be delivered not later than 10 working days after completion of the monitoring and measuring;

(ii) State the actual exposure in terms of concentration and time; and

(iii) State the steps which have been taken, are being taken, and will be taken, with specific completion dates, to terminate the exposure and prevent a recurrence.

(C) Medical treatment is not warranted because of vinyl physical properties

(D) An analysis of the emergency and measures taken with specific dates should be made.

(3) Monitoring results shall be posted for review by all employees. (Note: This is similar to what we do with the lead health status at Beaumont.)

NOTE: Only the Appendix Table of Contents is attached since most of the items in the Appendix have been reviewed.

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