

DRAFT
May 20, 1975

Chemical Division
PPG Industries

Reference: Para (K) Medical Surveillance
1910.39q Vinyl Chloride OSHA

The above reference details the minimum requirements that will be implemented in all PPG operations for employees working in VCM operations and exposed to VCM in air concentrations at or above the "action level."

- I. Pre-Placement Examination - All employees prior to being assigned to a job which will potentially expose them to VCM will be provided an initial medical examination in accordance with the above reference. If an employee's health would be materially impaired by exposure to VCM, he will not be assigned to a job which will potentially expose him to VCM. The Plant Physician will certify as to the suitability of an employee to work in a job potentially exposing him to VCM and to wear protective equipment and respirators, utilizing the form shown in attachment #1. A copy of this form will be provided to the employee, a copy will be placed in the employee's plant medical record, and other copies provided to appropriate management personnel.
- II. Periodic Examination - All employees working on a job which potentially exposes them to VCM will be provided medical examinations in accordance with the above reference at either 6 or 12-month intervals. If in the physician's judgment the employee's health would be materially impaired by exposure to VCM, he will be removed from such potential exposure. The Plant Physician will certify as to the employee's suitability as described above.
- III. Emergency (Massive Release of VCM) - Any employee involved in same will be seen by the Plant Physician as soon as possible.
- IV. Abnormal Liver Function Tests - If any of the 5 tests on the employee's serum specimen required in the above reference are abnormal, the employee will be evaluated in the Plant Medical Department and advised of the necessity to repeat the abnormal test or tests within 2 or 3 weeks prior to which time he should avoid such non-work related activities as might be expected to cause a test to be abnormal. Plant management should be advised as to the necessity to repeat the abnormal tests.

If the repeat test or tests are abnormal, the Plant Physician will certify as to the unsuitability of the employee to continue working in a job potentially exposing him to VCM. The Plant Physician will arrange for a more comprehensive examination of the employee with appropriate medical specialists. Such examination may include but not be limited necessarily to the following specific procedures when indicated: liver scanning, liver angiogram, and liver biopsy.

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- V. Return of an Employee to Potential VCM Exposure - If in the Plant Physician's opinion an employee, who has been removed from potential VCM exposure for health reasons, has sufficiently recovered so that VCM exposure would not materially impair the employee's health, the Plant Physician may so certify as described above. Such a decision might be appropriate if the abnormal tests return to normal and remain so for at least 3 months.
- VI. Contractor Employees - Such employees' medical surveillance will be as described above and under the direction of the Plant Physician.
- VII. Former PPG Employees' Follow-Up - All employees who have had 5 or more years' employment at PPG in a job where they were potentially exposed to VCM will be followed up as follows:
1. At the time that they leave PPG they will be advised as to the advisability of follow-up examinations every 3 years to include the 5 tests on a serum specimen required for VCM employees under the OSHA Standard and that PPG will pay for such tests if they provide us with a permanent address.
 2. PPG will send them a notice every 3 years advising them as to the arrangements for the tests and then advise them as to the results.
 3. PPG will request death certificates from the state when the person dies.
 4. Appropriate epidemiological analysis will be performed on the follow-up data received.

Note: Although not required by the above-referenced OSHA Standard because presently available medical evidence suggests involvement of other organ systems of the body is possible, the following additional tests should be considered on an annual basis:

SMA 12
CBC
Urine
FVC and FEV₁
Chest X-ray

Any abnormalities should be considered as a basis for possible rejection on the pre-placement exam and appropriate follow-up on the periodic exam.

VINYL CHLORIDE CERTIFICATE

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This is to certify that _____,
employee of the vinyl chloride (VCM) area, is physically fit for:

- a) Use of respirators of any kind.
- b) Use of protective equipment.
- c) Exposure to VCM in emergency.

Signed today after physical examination.

Date

Plant Physician