



INTEROFFICE
MEMORANDUM

Date 10 December 1974

Subject Action Steps to Meet OSHA Standard
on Vinyl Chloride

To Distribution

(Location, Organization, or Department)

From J. T. Barr

Valley Forge

(Location, Organization, or Department)

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The 9 October memo from A. R. Adams to Distribution detailed certain assignments on preparing for the 1 January effective date of the permanent OSHA standard on vinyl chloride. Recommendations for some of the action points assigned to me are given below. These have been discussed with the other persons concerned.

In many cases final decisions cannot be made until the program directive is available. This is expected to be published by next week. There is also a possibility that the courts may act on a part or all of the standard before 1 January.

I. Respirators

1. Until cartridge and/or canister types are approved, we will rely on the half-face, continuous air supplied respirators on hand. They are to be carried by all persons entering the regulated areas and worn (a) whenever in the polymerization building, or (b) when working on monomer-containing equipment, such as filters, etc., or connecting or disconnecting tank cars. (c) They must temporarily be disconnected before going up or down stairs or crossing the area.
2. Scott Air Paks or equal will be worn for re-entry in case of a release that shows above 10% LEL (3,600 ppm) on the Bacharach, or where concentrations above 1,000 ppm can be expected. They should be available in an area remote from the potential release points.
3. Provisions of 1910.134 must be met as to air quality and mask maintenance.

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4. These procedures will be revised as soon as additional types of equipment have been approved.

II. Protective Clothing

1. All workers assigned to the polymer building, or to other potential hazardous areas will be issued daily clean cotton or cotton/synthetic blend work uniform; pants and long sleeve shirts, or coveralls.
2. Spare clothing will be available in case of worker's becoming wet or unusually dirty.
3. We will continue to supply foul weather gear for jobs that anticipate the need for protection against splashing, etc.
4. Thus, the minimum clothing to be worn in the regulated area includes:
 - (a) clean outer garments
 - (b) hard hat
 - (c) eye protection
 - (d) respirator
5. Inside vessels, waterproof gloves will also be worn, plus boots or overshoes.
6. A change area will be available outside the regulated area.

III. Monitoring

1. Non-regulated areas
 - (a) Personal monitoring on an 8-hour TWA basis must be completed in time for the decision as to the need for regulation to be made and the regulated areas reported before 30 January.
 - (b) If two measurements more than five days apart show below 0.5 ppm, it is not necessary to test for the 5 ppm ceiling.
 - (c) It is recommended that monitoring be repeated quarterly or whenever there is reason to suspect that any change requires further testing.

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2. Regulated Areas

- (a) We understand that both area and personal monitoring will be required.
- (b) Monitoring results will be processed in the manner developed by the medical consultants.
- (c) It is recommended that, until we receive further information, all persons be monitored at least monthly for 8-hour exposures if they enter the regulated area. This would seem to include even the infrequent visitor. The 15-minute ceiling tests must be run in addition.
- (d) Area monitor alarms should be set below 25 ppm, say 20, to give those electing not to wear respirators time to put them on before the 25 ppm concentration is reached.



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'PVC Workers in Britain Want Stringent Standard: 'No Detectable' Amount

Britain's General & Municipal Workers' Union has proposed that exposure levels in polyvinyl chloride plants be limited to "the least detectable amount," claiming that vinyl chloride manufacture has been responsible for twenty-three deaths through liver cancer and an increase in other industrial diseases.

The union is a powerful one, having some 2,000 members involved in vinyl chloride plants in the UK.

A spokesman points out that "the overwhelming weight of medical opinion, together with evidence that the monitoring techniques in the US and Europe are similar to our own, brings us to the conclusion that the present interim UK standard is not acceptable to the union. We now require that manufacturers agree to set a standard of the least detectable amount of exposure."

He says that it is "no longer sufficient" for UK makers to relate their monitoring to exposures of even one part per million when equipment is now available to measure one part per billion. He adds that the new US standard of one ppm, which apparently worries UK manufacturers, is "not acceptable to either the US or the UK unions," and he asserts "neither are we prepared to negotiate or to bargain on exposure levels."

The union will convene a conference of shop stewards and union officials at which findings by medical scientists will be presented.

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Plastics Group Seeks Stay on VCM Standard

Society of the Plastics Industry petitioned the US Court of Appeals to stay an order of the Occupational Safety & Health Administration of the decision of that court on the basis of a recently promulgated Standard for Occupational Exposure to Vinyl Chloride.

The OSHA standard, which requires respiratory protective equipment, goes into effect January 1, 1975. Oral arguments on the case are scheduled before the Court of Appeals on December 11, 1974.

The stay has been requested because of the oral arguments, SPI says, "there is no possible way" to meet the required numbers of respiratory protective equipment by the end of the year.

This would have the practical effect of requiring many plants in the United States producing vinyl chloride monomer and poly-vinyl chloride resin to close by December 31, 1974, SPI says.

In its petition SPI also says that

much of the equipment specified in the standard has not yet been approved by the National Institute of Occupational Safety & Health (NIOSH), nor is it likely to be available by January 1.

According to SPI, respiratory equipment today "is only 26 percent of the demand with optimum supply being 50 percent of current demand."

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