



RDS

Interoffice Communication

To Plant Managers
From L. N. Vernon
Date June 11, 1975
Subject Chemical Exposure Abatement Program

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Let's discuss
RECEIVED
6-16-75

During our trips to the plants earlier this year, a program was outlined to begin abating all possible worker exposure to hazardous chemicals. At that time, monitoring was indicated necessary to determine how things were going. A number of "high risk" chemicals were identified that should take greatest priority in our efforts. These monitoring programs should now be well under way or certainly in the late stages of final planning. Below are guidelines which, when put into practice, will assure management and workers that our plants are safe, healthy places to work. Completion dates are given to help you plan your priorities to complete steps of the program. Attached is a suggested reporting form so all information coming in is uniform.

GUIDELINES FOR THE HAZARDOUS CHEMICAL EXPOSURE ABATEMENT PROGRAM

1. Assess chemicals dangerous enough to be monitored (complete).
2. Develop a "quick check" analysis for each one (by July 1, 1975).
3. Develop a plan to determine the concentration of the hazardous chemicals wherever in the plant they are the highest (by July 15, 1975).
4. Measure, to a level of statistical significance, and report concentrations obtained with this plan (by August 1, 1975).
5. When concentrations are greater than the action level (1/2 the TLV), develop an analytical method and procedure for personal dosimetry (by October 1, 1975).
6. Continue monitoring with "quick check" method for two months to try to get the plant below the action level (complete October 1, 1975).
7. If this fails, institute personal dosimetry to quantify the hazard of each job classification (begin October 1, 1975).
8. Plan engineering controls and administrative controls to assure employees remain unexposed to the hazardous chemicals above the action level (by December 31, 1975).
9. If plant is below the action level, monitor with a dosimeter often enough (frequency to be determined by local management for each situation) to assure the plant remains below the action level. Report results in the

Plant Managers
June 11, 1975
Page 2

monthly progress report (continuing).

10. If plant remains above the action level, perform dosimetry and report results in monthly progress report (continuing).
11. If plant remains above the permissible level, perform dosimetry and report results in monthly progress report (continuing).

Submit reports on the following chemicals:

ABERDEEN: Vinyl chloride, phthalic anhydride

BALTIMORE: Benzene, chlorine, hydrogen chloride

HAMMOND: Sulfur dioxide, sulfuric acid (SO₃), ammonia

NEWARK: Phenol, methanol, cresol

LAKE CHARLES CHEMICALS: Methanol, methyl chloride, phosgene, hydrogen chloride, ethylene oxide

LAKE CHARLES VCM: Vinyl chloride, ethylene dichloride, chlorine

OKLAHOMA CITY: Vinyl chloride

Monitoring assistance and advice on analytical techniques can be obtained from Robert M. Walston, MED, Ponca City, X-8896, or Dave Kuhn in this office.

If you have suggestions for improving this monitoring and reporting program, or if exceptions to this schedule are required, please advise.



L. N. Vernon

mk
Attachment

CC: JDBurns
DAKuhn
RMWalston