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W.R. Lawrence
10/1/78*



*PJS
See
Notes
Zell*

INTER-OFFICE CORRESPONDENCE

To: Z. G. Bell

Date: July 25, 1978

From: P. J. Snyder

Location: 10 West

Subject: VDC Workpractice
Guideline Status

A review was made of the current status of the Vinylidene Chloride Workpractice Guideline at Lake Charles on July 18 and 19, 1978. Attached for your information is a summary of those items which require additional attention.

Two major problem areas which warrant further discussion between plant management, Environmental Affairs, and the Industrial Relations Department are:

- What involvement is PPG to have with respect to contractor workers in plant areas affected by workpractice guidelines and internal standards, e.g., VDC, EDC, Hg.
- What medical surveillance is to be afforded to former PPG employees who are covered by workpractice guidelines. The VDC Workpractice requires/recommends a periodic follow-up of former PPG employees who have had five or more years potential exposure to VDC.

*Same as last
find to last*

*1. Identify them
2. if possible know
the VDC test
on 15-jm*

In general, Lake Charles is making progress in identifying potential VDC problem areas and implementing corrective/preventive control measures. While employee exposures in excess of the internal standard have been found on certain job categories, a reduction on actual VDC exposure levels should be noticed with the implementation of an enforced respiratory protection policy and the use of a closed sampling system as proposed.

(overexposed)

A periodic review of the progress made in implementing the VDC Workpractice will be made in order to keep you up to date. If you have any questions or comments on this review, please let me know.

VDC Workpractice Guideline "Noncompliance Items"

Section

Recommended Program Requirements

B.3. Definitions

"AUTHORIZED PERSON" means any person specifically authorized by PPG to enter a VDCM regulated area. A complete roster of the persons who are authorized to enter the plant's VDCM regulated area must be developed and maintained.

- A complete roster of PPG employees who are medically authorized by Dr. Lovejoy to work in the organics area is presently maintained. While this authorization also applies

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to contractor workers who are working in the vinyl chloride areas, it does not at the present time apply to contractor employees potentially exposed to vinylidene chloride.

A determination of the medical surveillance that is to be required of contractor employees potentially exposed to other organic chemicals including vinylidene chloride is required.

C.1., C.2.
Permissible
Exposure
Limits

No employee may be exposed to a VDCM air concentration greater than 2.5 ppm (TWA) as determined by personnel monitoring conducted for a period not less than four (4) but not greater than ten (10) hours and averaged over the time period of actual sampling; and,

No employee may be exposed to VDCM to concentrations greater than 10 ppm (ceiling) as determined by any personnel monitoring conducted for 15 minutes.

• There presently are plant operations which can result in employee exposures in excess of the prescribed limits. Three job categories with the greatest exposure potential are: (1) EDC Operator, (2) Mc Operator, and (3) Mc Aux. Operator. Other workers with exposure potential in excess of 1.0 ppm TWA include the Mc Lead Operator, P/T Still Operator, and loading personnel.

The VDC Emission Control Project (Res 613.0 P746) as planned will minimize this exposure potential by 1981. Interim control measures are being taken to eliminate or minimize known sources of exposure, e.g., the installation of closed loop and a review of the adequacy of present laboratory ventilation systems.

F.d.
Methods of
Control

In order to minimize both releases of and exposures to VDCM, all the applicable operating manuals shall be reviewed and revised so as to include precautionary information and preventive steps that must be followed when working with VDCM. If two consecutive personnel monitoring determinations conducted on a single job category reveal an actual overexposure to VDCM, the written work procedures followed by the employees assigned to that job category shall be reviewed in order to ascertain the need for additional methods of control.

• Based on past experience and the information generated by the monitoring program, those jobs which require respiratory protection have been identified.

An announcement outlining when respiratory protection is to be worn is to be posted in the unit control room (proposed requirements provided as Attachment 1). This procedure is to be substituted for the required manual revision.

I.1.
Emergency
Procedures

A written operational plan for emergency situations shall be developed. The plan shall specifically provide for:

- A. Evacuation procedures.
- B. Fire fighting procedures.
- C. The use of appropriate protective equipment and clothing, including the use of a self-contained breathing apparatus.
- D. Containment and cleanup procedures.

● At the present time a "written operational plan for emergency situations" is not available. B. Lynch is to prepare this procedure.

J.1.
Training and
K.1.
Medical
Surveillance

Each employee engaged in VDCM operations shall be provided training in a program relating to the hazards of VDCM and the necessary protective measures for its safe use. Such a program shall be provided at the employee's initial training and annually thereafter; and,

Any employee assigned work in an area where a potential exposure to VDCM may occur shall be placed on a medical surveillance program. The program shall provide each such employee with an opportunity for examinations and tests in accordance with this paragraph.

● Presently, employee training and medical surveillance applies to PPG employees only and not contractor personnel. Again, this area of involvement needs to be resolved.

It is further suggested that the Employee Training Program provide for a documentation that each employee affected by this workpractice was in fact informed of those items listed under Section J of the guideline.

K.1.(G)
Former PPG
Employee
Follow-up

All employees who have had five or more years employment at PPG in a job where there has been VDCM exposures above those specified in Section C of this workpractice guideline will be followed-up as described below.

1. At the time of departure from PPG's employment, they will be advised that they are entitled to an exit physical examination and a follow-up examination is advised every three years to include the five tests specified in (K)(1)(c) of this workpractice guideline.
2. PPG will request death certificates when an employee or former employee dies.

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*Should continue on for
retirees.*

- An exit physical is performed on all newly retired/terminated employees. No plans have been made to address this requirement of the workpractice.

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/tea

Attachment

cc: F. C. Dehn w/o

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