



INTER-OFFICE CORRESPONDENCE

To: F. C. Dehn

Date: April 3, 1978

From: Z. G. Bell

Location: 10 West

Subject: EDC Workpractice Review

A meeting was scheduled in Conference Room 3 in the General Office for the purpose of reviewing, commenting, and modifying the EDC draft workpractice guideline transmitted to the plants on January 10, 1978.

Those in attendance were: Dr. L. B. Grant (G.O.), R. E. Sourwine (G.O.), P. J. Snyder (G.O.), Dr. F. C. Dehn (G.O.), R. G. Corley (Beaumont), K. Ezzelle (Caribe), W. Peard and R. Miller (Lake Charles). This writer served to obtain and direct the meeting.

A review of the background leading up to the development of the EDC workpractice was outlined. This included the NIOSH criteria document issued March, 1976, the NCI results from their gavage study, the participation of PPG in the MCA/European research program nearing completion, the information on the NCI studies transmitted to the plants and to our customers, and the anticipated rulemaking under OSHA's standards completion project.

The meeting attendees were informed of Environmental Affairs' responsibility in anticipating health problems, estimating governmental action on standards, interpreting the available data to determine if the existing standards adequately protect the workers' health, and setting internal standards which are based on the facts to assure the Chemical Group's health programs reflect a responsible posture. Anticipation of regulatory actions and development of workpractices will provide more time to plan for reduction of emissions and "tightening-up" of operations where these can be readily and practically achieved.

The group was told that the EDC workpractice was the second such document developed and submitted for comments prior to implementation (VCM, VDCM), and there are two more in preparation (Mercury and Benzene).

It was stressed that plant input to these workpractices is essential for them to be practically achievable and realistically enforceable by the plants. This meeting provided an opportunity for the plants to raise questions concerning interpretation of certain parts of the workpractice and for the authors to become familiar with specific plant problems outside of their control. In these cases, modifications will be made so the workpractices can be implemented.

Those present were advised, that once reviewed and the essential changes made to the workpractice, management would expect them to be fully implemented.

The plant representatives present wanted the group management to recognize the plant managers' needs for additional manpower and costs for implementation of the workpractices as well as additional medical coverage at some plants. There was an expression that plant operating personnel need to understand that these workpractices are important and endorsed by Chemicals Group management.

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Comment Reference To EDC Workpractice Guideline

The ramifications raised by the plant representatives, concerning contractors and their employees, resulted in at least temporarily restricting the workpractice scope to PPG employees only. There were questions about the legal responsibility which have been referred to the Law Department.

Another area of significant impact involved the removal from a job of an employee because of medical reasons and the "rate retention" clause in many labor contracts. This also supported the need to exclude contractors for the present. This is Beaumont's first workpractice, so some start up problems are expected because of their unique situation.

Caribe's representative wanted a "casual employee" exclusion in the workpractice.

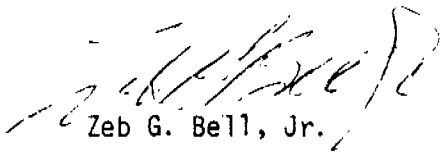
The requirement that PPG provide medical surveillance to contractor personnel met with strong objections since outside contractors would not submit to preplacement examinations. This would lead to many problems getting contractors into the plant. It was agreed that preplacement physicals are desirable for contractors, however, without some government regulation requiring such, the implementation would be difficult.

The PPG Law Department must be consulted to determine if PPG can transfer medical responsibility to the contractor. Is it PPG's position to await government regulations before addressing the requirements to all workers (including contractors)?

Based on other comments, the EDC workpractice guideline will:

1. Exclude contractor personnel (temporarily).
2. Revise the personnel monitoring section to cover maintenance personnel.
3. Dr. L. B. Grant is to rewrite the medical examination section to exclude certain medical tests and to include information to be made available to the examining physician.
4. There will be a section included in the workpractice to exclude the coverage of a casual visitor under these workpractices.
5. The new draft with the revisions will be sent to the plants for their final review and comments.

In summary, this meeting was beneficial to the General Office personnel present, and a better understanding of the Chemical Group's objectives was had by plant representatives.


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