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To: All Aberdeen Employees

From: A. H. Sather  
Date: April 2, 1985

VISTA

Interoffice  
Communication

Subject: VCM EMISSION/EXPOSURE REDUCTION

There has been some confusion about the procedures to be followed when readings are observed on the plant VCM fixed point monitor systems. I have attached a table which should clarify our responsibilities in this very important area. It is important to note that these procedures are designed to satisfy our internal needs in terms of reducing VCM emissions and employee exposure, while at the same time ensure our compliance with EPA and OSHA regulations.

Any reading on a fixed point monitor, no matter how small, should be located and secured. The specific action steps outlined on the attached sheet are provided to ensure an appropriate response to high ambient concentrations of VCM.

If you have any questions, please see your supervisor or me.

*A. H. Sather*

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c: JF, JWW, DEPARTMENT HEADS, ALL SUPERVISORS

| <u>Condition</u>                                                                                                       | <u>Actions Required</u>                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 consecutive readings over 3 ppm for a single point or 1 reading over 10 ppm.                                         | <ol style="list-style-type: none"><li>1) Clear the immediate area of all personnel.</li><li>2) Locate the source of the VCM leak.</li><li>3) Initiate action to eliminate the source of VCM.</li><li>4) Re-admit personnel to the work area without use of respirators only after ambient VCM concentrations are below the 3 ppm action level.</li></ol>                                                  |
| 3 consecutive readings over 5 ppm for a single point.                                                                  | <ol style="list-style-type: none"><li>1) The four action steps given above must be accomplished.</li><li>2) These conditions are defined as an "EPA leak" and a leak form must be completed by Operations and/or Lab personnel (depending on which GC).</li></ol>                                                                                                                                         |
| A known release of VCM <u>or</u> 3 consecutive readings over 10 ppm on any GC (eg. points 3, 4, 5 on the new unit GC). | <ol style="list-style-type: none"><li>1) Sound the vapor release alarm.</li><li>2) Clear the area of all personnel.</li><li>3) Initiate action to locate and eliminate the source of VCM.</li><li>4) Complete documentation of "EPA leak".</li><li>5) Re-admit personnel to the work area without use of approved respirators only after ambient VCM concentrations are below the action level.</li></ol> |