

Vista Chemical Company

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IGG: JOL: FBJ: AC: AJO: RF

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VISTA

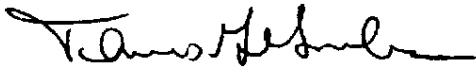
November 11, 1991

Mr. James E. Williams
Woodley, Williams, Fenet
Attorney's at Law
500 Kirby Street
Lake Charles, Louisiana 70601

Dear Jim:

Attached is a draft of our answer for Interrogatory Question 6 in the Ross case. Please let me know if you have comments. The blank is a date yet to be found.

Sincerely,



Thomas G. Grumbles, C.I.H.
Manager Environmental Affairs

dlj

Attachment

cc: Amy Skinner

VVV 000008079

Since it's formation, Vista Chemical has taken multiple actions to alert its employees to the hazards of vinyl chloride exposure and inform them of steps necessary to protect them from such hazards.

All new employees are given detailed training on the health and safety hazards of vinyl chloride. Employees are provided this training on an annual basis. The training includes information on the specific known health hazards of vinyl chloride, the specific physical hazards, and information on safe handling practices and procedures to be followed when handling vinyl chloride. The plant also provides annual hazardous materials training that contains information on the hazards of vinyl chloride. In addition to the annual training, the workplace contains vinyl chloride warning labels or signs on "containers" that contain vinyl chloride monomer, or vinyl chloride containing streams.

Engineering controls are utilized where feasible to prevent employee exposure to vinyl chloride. Where controls are not feasible, appropriate respiratory protection is provided to employees and they are trained in its use to prevent exposures. Procedures are in place to determine the concentration of vinyl chloride present and determine the need for respirators and the appropriate level of protection to be worn. These procedures include a network of fixed - point continuous monitors. These monitors continuously monitor the level of vinyl chloride in the processing unit and a concentration readout is in the control room. The readout includes a visual and audible alarm if concentrations exceed specified levels.

VVV 000003080

The operators have direct reading equipment to measure vinyl chloride in areas of suspected leaks or elevated concentrations. This instrumentation is a supplement to the continuous monitors and is used to determine the source of leaks or other process emissions.

Procedures are in-place to monitor the concentration of vinyl chloride in any confined space, such as a tank or vessel, prior to entry to determine the appropriate level of employee protection needed.

Procedures are in-place to clear, or purge, vinyl chloride from equipment that will be opened to atmosphere or worked on in a manner that may result in employee exposure.

In addition to the items described to directly inform employees, and protect them from the hazards of vinyl chloride routine, personal monitoring is done to evaluate vinyl chloride exposures and annual medical monitoring offered to all employees.

With the exception of the hazardous materials training, which was instituted in _____, all of the above programs and procedures have been in place since the formation of Vista Chemical.

VVV 000008081