

REG-5114

TO	E. W. HARRINGTON	FIELD POINT OR ADDRESS (PARTIAL & B. IN THE NO.)	CLEVELAND OFFICE D/5450	DATE YOUR LETTER
FROM	R. L. TOOLE	FIELD POINT OR ADDRESS (PARTIAL & B. IN THE NO.)	CLEVELAND OFFICE D/5450	DATE THIS LETTER
SUBJECT	STAFFING FOR OSHA CHLORIDE REGULATIONS			

STAFFING FOR OSHA CHLORIDE REGULATIONS

Each of the PVC plants has approached the problems of staffing to handle the activities involved in compliance with the VCM standard in a little different way. The size of the plant, age of equipment, diversity of products, and plant "personality" have been factors leading to different approaches to the additional burden involved in adapting to the new way of life. Comparison is most inexact but the recent attempt to obtain similar data from each plant has provided some interesting comparisons.

	ALCO	HENRY	LOUISVILLE	LONG BEACH	PEDRICKTOWN
Total Employees	642	319	1039	142	247
PVC Employees	184	114	215	47	58
Authorized Employees	339	182	425	57	136
Number of Regulated Areas	4	1	5	1	2
Number of Personal Monitorings/ Month	396	130	454	124	170
<u>Estimated Time - Man-hours/Month (MH/M)</u>					
Personal Monitoring	300	90	350	90	84
Leak Detection	230	200	740	90	145
Anal. Laboratory	1090	130	850	520	215
Record Keeping	174	50	135	35	153
Medical Surveillance (Nurses)	356	87	356	43	273
<u>Total Estimated Time (MH/M)</u>					
Monitoring, Leak Detection, Analytical, Record Keeping, and Medical	2150	557	2430	778	870
Equivalent Number of People	12.4	3.2	14	4.5	5.0
Equivalent Number Per 100 PVC Employees	6.7	3.5	6.5	9.5	8.6
* * *					
<u>Assignment of Safety People</u>					
Total Safety (Including Nurses)	8	3	11	2	3.5
Number for OSHA VCM	3.7	0.7	3	0.5	1.1
Total Nurses	3	1	5	1	1
Number for OSHA VCM	2	0.5	2	0.25	0.6

September 5, 1975

Who HandlesPersonal Monitoring

ALGC - Environmental Health (Safety)
Henry - S/E Operators (4 Special Production People)
Louisville - Environmental Dept. (3 engineers, 6 operators)
Long Beach - Laboratory Operators
Pedricktown - Technical Trainee

Leak Detection

ALGC - Foreman, Operators (Regular Production)
Henry - S/E (4 Special Production People)
Louisville - OVA (4 Special Mfg. Processes People)
Long Beach - Foreman, Operators (Regular Production)
Pedricktown - Operators (Regular Production)

Record Keeping

ALGC - Nurse, Operators, Environmental Dept.
Henry - Nurse, OSHA Administrator, Professional Service Emp.
Louisville - Nurse, OSHA Administrator
Long Beach - Nurse, OSHA Administrator
Pedricktown - Nurse, Technical Trainee, Chemist

Overall, it seems that 3.5 to 9.5% of people assigned to the PVC departments are devoted to the specific jobs of Personal Monitoring, Leak Detection, Record Keeping and Medical Surveillance. These tasks might be considered direct involvement in OSHA VCI compliance. In addition, of course, is the rather substantial effort in the less direct engineering, production and technical areas.

R. L. Toole
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RLT:jmh

cc: OSHA Administrators
H. Waltemate
J. Klupar

NGC 17675

File 819

B.F.GOODRICH CHEMICAL COMPANY
ENVIRONMENTAL HEALTH STEERING COMMITTEE

A G E N D A

Second Meeting: October 20, 1975 - 8:30 a.m. - 10:30 a.m.
Cleveland Office - Conference Room 1-B

The first meeting set the policies and objectives of the committee.
Subsequent meetings will cover details of specific chemicals.

- I. VCM review.
 - a) Whitney's letter of 10/6.
 - b) New GC for NIOSH/OSHA method.
 - c) Criteria for method acceptance.
- II. Medical exams for Carbopol employees.
- III. Benzene - review and clarification.
- IV. Lead
 - a) Proposed OSHA standard - should we comment?
 - b) Monitoring frequency, sampling procedure, etc.
- V. Carbon monoxide - procedure for TWA.
- VI. Acrylonitrile - frequency, analytical procedure, abatement.
- VII. Butadiene - frequency, analytical procedure, abatement.
- VIII. Styrene - frequency, analytical procedure, abatement.
- IX. Computer storage of data other than VCM.

J.A. Klupar
J.A. Klupar

JAK:cj
10/13/75

cc: Committee

O.F. Beckmeyer
L.B. Crider
E.W. Harrington
M.N. Johnson, M.D.
E.B. Katzenmeyer, Jr.
J.A. Klupar
W. Moorehouse
P.D. Terry
H. Waltemate
T M Whitney

Others

J.L. Nelson
R.W. Strassburg
J.E. Stroope
~~R.H. Tschopp~~
W.C. Holbrook
B.M.G. Zwicker

NGC 17676