

PROPOSED TRAINING PROGRAM FOR
VINYL CHLORIDE (VC) STANDARD 1910.93Q

"Each employee engaged in VC or polyvinyl chloride (PVC) operations shall be provided training in a program relating to the hazards of VC and precautions for its safe use." The program shall include:

- I. "The nature of the health hazard from chronic exposure to VC including specifically the carcinogenic hazard";
 - A. Chronic exposure and carcinogenic hazard:
 1. Read paragraph II "Findings regarding carcinogenicity, exposure levels and feasibility -(1) carcinogenicity of vinyl chloride" (Preamble to 1910.93Q) See attachment #1.
- II. "The specific nature of operations which could result in exposure to VC in excess of the permissible limit and necessary protective steps";
 - A. Specific operations which could result in excess exposure:
 1. Cover plant layout diagrams and specific jobs as they relate to monitoring data results.
 2. Utilize monitoring summaries and letters from Mr. R. Arnold on "mask areas," etc.
 - B. Necessary protective steps:
 1. Good operating procedures to prevent occurrence
 2. Preventative maintenance
 3. Monitoring
 4. Respiratory protection
- III. "The purpose for, proper use, and limitations of respiratory protective devices";
 - A. Purpose for:
 1. Read section III, paragraph (7), Respiratory Protection. See attachment #2.
 - B. Proper use and limitations:
 1. Review chart from 1910.93Q, (g), (4), Selection of Respirators for VC. Explain types listed. See attachment #3.
 2. Cover "Quarterly Information Form" for those employees who elect not to wear respirators below 25 ppm VC. (Distributed to all employees quarterly) To be written.
 3. Cover limitations as listed in ANSI Z88.2-1969, Practices for Respiratory Protection. See attachment #4.

4. Distribute SOP's for all respirators. Example - see attachment #5.
5. Demonstrate proper use of each type to be provided.
6. Have each employee practice using each type of respirator which will be provided.
7. Cover maintenance required by 1910.134 and ANSI Z88.2-1969. See attachment #6.

IV. The fire hazard and acute toxicity of VC, and the necessary protective steps:

A. Fire hazard:

1. Cover flash point and explosive limits.

B. Acute toxicity:

1. Cover physiological response and acute vapor exposure as listed in F. A. Patty's Industrial Hygiene and Toxicology, Vol. II, Pgs. 1303-4. See attachment #7.

C. Protective steps:

1. Emergency gas leaks procedure.
2. Cover respiratory protection equipment requirements.

V. The purpose for and a description of the monitoring program:

A. Purpose for:

1. Cover section III, (4), monitoring, in the preamble to 1910.93Q and paragraph (d), monitoring in 1910.93Q. See attachment #8.

B. Description of program:

1. Personnel monitoring. See attachment #9
2. Miran monitoring. (No attachment - To be completed)

VI. The purpose for, and a description of, the medical surveillance program:

A. Purpose for:

1. Only tests available which are useful for medical surveillance - No positive tests, etc.
2. Development of medical history and data which aids in suggesting problems of a general nature - Search for possible early warning signals of a specific nature.

B. Description of program:

1. Read section (K), Medical Surveillance of 1910.93Q, and appendix A. See attachment #10.
2. Make chart comparison of requirements under law and Firestone program.
3. Necessity of continuing our program and need for employee cooperation.

VII. Emergency procedures:

A. Hazardous operations:

1. Cover as defined by 1910.93Q and as it relates to our operations.
2. Cover as it relates to respirators.
3. Cover as it relates to protective clothing. (Show sample garmet) Specify who will wear.

B. Emergency situations:

1. Present written operational plan. (to be written)
Includes hazardous operations and evaluation plan.

VIII. Specific information to aid the employee in recognition of conditions which may result in the release of VC:

- A. High pressure in reactors.
- B. Frost on seals, valves, joints, etc.
- C. Leaking slurry pipes.
- D. Etc.

IX. A review of this standard at the employee's first training and indoctrination program and annually thereafter:

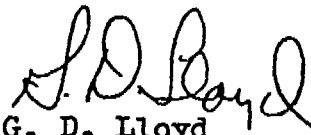
A. Initial program:

1. Cover all parts of 1910.93Q not covered in items I thru VIII above. See attachment #11.

B. Annual review:

1. Reduce to slide and tape program and present to employees on individual basis thru the Singer Caramate units.

- X. All materials will be organized for easy submittal to OSHA if requested by OSHA.

 OCC 0769
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