GOODRICH INTERORGANIZATION CORRESPONDENCE

TO	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
Mary E. Long	Avon Lake G.C.	
FROM	**FIELD POINT OR DEPT. & BLDG. NO.**	**DATE THIS LETTER**
H.W. Dietz, M.D.	Akron - D/0020, 5-H	4-16-81

SUBJECT

Fertile Female Policy

The medical department is unable to establish a safe level of exposure to vinyl chloride for the developing fetus. Areas where monitoring for vinyl chloride is required are known to result in exposure of the potential mother and therefore, the fetus, to vinyl chloride. For this reason, regular employment in such areas is prohibited for fertile females.

While it is recognized that vinyl chloride can probably be detected in all areas within the plant boundary and possibly for some distance beyond, the levels outside areas where monitoring is required are considered to be comparable to the routine everyday areas to which the general population is exposed.

Your interpretation of the corporate policy is incorrect. A fertile female shall not be assigned to work in an area where her exposure to vinyl chloride is required to be monitored and regular exposure to levels as high as 1 ppm is not acceptable.

Your list of hazardous chemicals is not current, so I am attaching a copy of the latest list.

H. W. Dietz

v

cc: S. Henning
R. Montgomery

26137001

BFG46556

Acrylonitrile	Employment not permitted in areas where the OSHA regulation (1910.1045) applies and where that regulation requires quarterly or more frequent monitoring of employee exposures.
Benzene	8-hour TWA not to exceed 0.5 ppm.
Carbon Tetrachloride	No regular daily exposure. Exposure may be permitted in laboratory situations if exposure is to less than 10 ppm and no more than 150 minutes/week in increments no greater than 15 minutes with a minimum of two hours between exposures.
Chloroform	As for carbon tetrachloride.
Chromium (VI)	8-hour TWA not to exceed 0.025 mg/M^3.
Dimethyl acetamide	As for carbon tetrachloride.
Lead	8-hour TWA not to exceed 0.05 mg/M^3 provided blood leads do not exceed 30 ug/100 gm.
Methyl Ethyl Ketone	8-hour TWA not to exceed 100 ppm.
Vinyl chloride	Employment not permitted in areas where monitoring is required.
Ethylene thiourea	8-hour TWA no greater than 0.1 ppm
Mercury	8-hour TWA no greater than 0.05 mg/M^3 provided urine mercury levels do not exceed 75 ug/1.

APR 15 1981

April 13, 1981

Dr. Harold W. Dietz
Director of Health & Environmental Services

Dear Dr. Dietz:

Avon Lake General Chemical is attempting to obtain a clarification or working policy on the topic of fertile females.

We are in need of a clarification to aid us in answering those females we are recruiting who want to work in the restricted area as well as our more senior female engineers who also desire experience in regulated areas.

Enclosed is our suggested fertile female policy for your approval, job breakdowns of times in regulated and non-regulated areas and our list of hazardous chemicals and their restrictions.

Questions and comments will be appreciated. Please contact me at extension 1832 in Avon Lake.

Mary E. Long

Mary E. Long
Personnel Assistant
Avon Lake General Chemical Plant

MEL/ecw

Enclosures/

Avon Lake General Chemical

FERTILE FEMALE POLICY

A female employee with childbearing capability may be assigned to work in vinyl chloride regulated areas under the following conditions:

a. The employee must wear an airline respirator when a yellow warning light is flashing indicating exposure over one part per million (ppm) but less than three ppm.

b. The employee must leave the regulated area when a red warning light is flashing indicating exposure in excess of three ppm.

c. The employee must not be exposed to vinyl chloride in excess of one ppm Time Weighted Average (TWA) for an eight hour period as shown by monthly personal monitoring.

The employee will not be assigned in areas where she would be exposed to hazardous chemicals other than vinyl chloride in excess of exposure limitations specified by BFGoodrich.

MEL/ecw
4/1/81

STRICTLY PRIVATE

March 27, 1979

Mr. P. C. Zellers

The following chemicals and corresponding exposure limitations have been identified by the Medical Department as requiring restriction from employment/removal from the area for fertile females:

Benzene 954 H34	8 hour TWA not to exceed 0.5 ppm.
Carbon Tetrachloride 954 H80 Byproduct of Chloroform	No regular daily exposure. Exposure may be permitted in laboratory situations if exposure is to less than 1 ppm and no more than 150 minutes/wk in increments no greater than 15 minutes with a minimum of two hours between exposures.
Chloroform 954 H40 1.4$\overline{M}$ lbs.	As for carbon tetrachloride.
Chromium (VI)	8 hour TWA not to exceed 0.025 mg/M3
Lead 913 2.2$\overline{M}$ lbs.	8 hour TWA not to exceed 0.05 mg/m^3 provided blood leads do not exceed 30 mg/100 gm
Methyl Ethyl Ketone 953 G23	8 hour TWA not to exceed 100 ppm
Vinyl Chloride	Employment not permitted in areas where monitoring is required (or levels greater than 0.5 ppm)
Ethylene Thiourca	8 hour TWA no greater than 0.1 ppm
Mercury 951 C48	8 hour TWA no greater than 0.05 mg/M^3 provided urine mercury levels do not exceed 75 ug/L

Richard A. Guyton, M.D.

MEL/ecw
3/30/81

26137005

BFG46560

JOB BREAKDOWNS

Position: Technical Staff

Regulated

Polymerization:

- 1 to 3 hours (maximum)
- Monitoring run through building; check charts.
- Monitor charging times.
- Twice a day monitoring of process.
- Catch shifts, operator interface.
- Experimental work. e.g., modifying charge process.
- Total: 30% of time or 12 hrs./week

Non-Regulated

Dryer:

- Quality control on final product.
- Interface between production line and laboratory.
- Routine paper work.
- Customer work with production and Lab.
- Handle customer complaints.
- Handle returned goods.
- Inspect and sample goods.
- Interpret data on sample; generate answer.
- Interaction with production in Dryer Bldg.
  50% (more mech. 1st floor).
- Total: 50% or 20 hrs./week.

Concentrator Building:

- Monitoring.
- Operator interface.
- Check out equipment.
- Trouble shooting.
- Startup and training.
- Maintenance.
- Experimental work. i.e., process modification.
- Total: 5% or 10% 2 or 4 hrs./week.

MEL/ecw
4/13/81

JOB BREAKDOWNS

Position: Process Engineer

Regulated Area

Polymerization:

- Monitoring - Control room.
- Trouble shooting.
- Some mofification and experimentation.
- Vinyl samples.
- Maximum of 3 hours in area at a time.

Total: 20% of his time or 8 hrs./week.

- Instrumental percent development in control room.

  3 hrs. or 4.

Non-Regulated Area

Dryer:

- Office work.
- Check over instruments.
- Projects.
- Visual observations.
- Meetings, etc.

Total: 80% or 32 hrs./week.

Instrumentation:

- *Process Control.*
- Process overseeing.
- Working w/p.c.'s

MEL/ecw
4/13/81

J. W. Gressler — ALGC - Health, Safety and Environmental Affairs

R. C. Lockemer — ALGC — 7-13-81

OSHA Progress Report - May, 1981

1. The results of personnel and area monitoring conducted during the month are presented in the attached table.

2. A maintenance mechanic was restricted from working in Estane for 6 months because of possible MDI sensitization. The individual evidenced symptoms of MDI exposure for the second time in as many months while working in B/433.

3. Geon West has stopped using DOA, a suspect carcinogen, and switched to Sanicizer 97.

4. We met with representatives of Robert Ross and Sons, BFI, and Norton Construction to obtain their approval to stop monitoring their employees for VCM and acrylonitrile. With the exception of a few VCM readings at Robert Ross, exposure to VCM and AN has been below the OSHA action levels. Robert Ross has agreed to cessation of our AN monitoring. We will continue VCM monitoring until the exposure levels remain below the action level. BFI and Norton Construction are reviewing our proposal.

5. Four employees in Hydrophilics, including a supervisor, experienced nausea and diarrhea while working in B/437. The only common denominator we could find was their work on a plugged extruder line. The men were working around the extruder for several hours in the presence of acrylate fumes. This is the first time anyone in Hydrophilics has reported these effects, even though similar situations have occurred in the past.

   Neither Cleveland nor Akron were able to provide much help in identifying the cause of the nausea and diarrhea. Hydrophilics has modified their extruder line to prevent plugging in the future.

6. Personnel monitoring of weighman in B/438 indicates that lead exposures are above the OSHA allowable of 50 mg/m^3. In the past, weighman exposure to lead has been very low. Similarly, lead levels in the blood have also been low. The exact cause of the recent high readings is unknown. Compound West has begun routine cleaning of the screens at the weigh station and has closed off unused sections of the evacuation system to increase suction in the immediate vicinity of the scales. Hopefully, these measures will alleviate the problem. If not, additional employee protection, such as the ventilated helmets used at Pedricktown, may be needed.

Distribution:

B. R. Welch
W. E. Horton
C. Bayard
J. R. Shellenberger
D. D. Quester
J. C. Meck
E. C. Gilbert
D. J. McDonald
K. J. Kaminski
T. S. Bialke
H. Waltemate
J. A. Kiel - Ped.
D. J. Gargas

To: J. W. Gressler 7-13-81

7. Noise levels in excess of 90 dBA exist in B/465A. Signs have been posted at all entrances requiring hearing protection when working in the building.

8. Our lab and ALTC are working to resolve discrepancies between their respective MDI analytical techniques. Our lab's method has been modified and a series of experiments are being conducted to verify its accuracy.

R. C. Lockemer

RCL/bp

SUMMARY OF

PERSONNEL MONITORING

MAY , 1981

Parameter	Allowable Conc. 8 hr. TWA	Month			Year-To-Date		
		No. of Samples	Avg. Conc.	No. Above Allowable	No. of Samples	Avg. Conc.	No. Above Allowable
VCM*	1 ppm						
Plant		186	1.00	27	761	0.63	80
B/432		-	-	-	-	-	-
B/438		-	-	-	1	0.44	-
B/449		1	0.50	-	5	0.82	1
B/451		26	1.38	8	114	0.75	21
B/452		31	0.25	2	130	0.20	2
B/454		3	0.14	-	22	0.29	1
B/455		8	0.16	-	39	0.22	1
B/457		3	0.13	-	21	0.16	-
B/458		-	-	-	7	0.02	-
B/459		7	0.62	1	19	0.42	1
B/461		29	1.64	9	110	1.45	29
B/463		15	0.27	1	73	0.30	5
B/464		28	2.89	6	146	1.00	19
B/465		2	0.08	-	3	0.20	-
B/466		33	0.09	-	69	0.09	-
B/468		-	-	-	1	0.05	-
B/471		-	-	-	-	-	-

* Includes all long term monitoring with and without tasks.

SUMMARY OF

PERSONNEL MONITORING

May , 1981

Parameter	Allowable Conc. 8 hr. TWA	Month			Year-To-Date		
		No. of Samples	Avg. Conc.	No. Above Allowable	No. of Samples	Avg. Conc.	No. Above Allowable
Dust							
Total	10 mg/m^3	0	0	0	0	0	0
Respirable	5 mg/m^3	12	2.43	2	27	1.85	2
Noise	90 dBA	9	81	0	40	69	1
Metals							
Sb	500 $\mu g/m^3$	0	0	0	36	46.2	2
Cd	200 $\mu g/m^3$	0	0	0	36	0.34	0
Cr	500 $\mu g/m^3$	0	0	0	15	1.22	0
Pb	50 $\mu g/m^3$	1	999.0	1	38	63.55	4
Other							
HPA	0.5 ppm	0	0	0	6	0.03	0
DOP	5. mg/m^3	0	0	0	2	0.01	0
AN	1 ppm	0	0	0	7	< 2.	0

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BFG46566

OSHA COMPLIANCE - VCM

May , 1981

PERSONNEL MONITORING - % < 1 PPM

Area	Goals					Actual			
	1st Qtr. (%)	2nd Qtr. (%)	3rd Qtr. (%)	4th Qtr. (%)	Annual (%)	Month (No.)	(%)	Year-to-Date (No.)	(%)
B/451	78	78	78	78	78	26	69%	114	81
B/461	78	78	78	78	78	29	69%	110	73
B/463	95	95	95	95	95	15	93%	73	94
B/464	75	78	84	86	81	28	78	146	87

AREA MONITORING - % < 1 PPM

Area	Goals	Actual	
	Annual (%)	Month (%)	Year-to-Date (%)
B/451	90	85	81
B/461	90	77	82
B/463	90	97	96
B/464	81	87	87