



*File
- OSHA
Compliance
Program*

Interoffice Communication

To R. T. Ferrell
From E. L. Kieschnick
Date August 9, 1974
Subject OSHA Compliance Program for Oklahoma City

Since March, 1974, approximately 4,000 engineering man-hours and 40 projects have been directed toward establishing and reducing VCM exposure levels in the Oklahoma City plant. Some of the major improvements to date are:

	<u>PROJECT DESCRIPTION</u>	<u>INITIAL CONCENTRATION (ppm)</u>	<u>RECENT MAXIMUM CONCENTRATION (ppm)</u>
✓ 1.	Manual rinse of reactors between batches terminated	10,000	NONE
2.	Enclosure and vent system for Chem Wash Sweco	10,000	10
3.	Enclosed seal for the slurry blend tank exhaust	8,000	25
4.	Negative pressure system on M-500 dryer Sweco	1,000	5
5.	Manifolded recovery system to a remote area	1,000	10

As sources of high VCM emission have been resolved, the sampling program has been redirected to the remaining areas of greatest potential for worker VCM exposure. Consequently, in the 4 weeks prior to August 9, the personnel dosimeter sampling program has concentrated on job functions that represent only about 8% of the total manpower effort at Oklahoma City. Results from these 4 weeks of testing are summarized by exposure range on the following page.

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<u>VCM CONCENTRATION (PPM)</u>	<u>% OF TOTAL * SAMPLES</u>	<u>JOB FUNCTION</u>
0 to 5	55 72	Resin resift in dryer building; reactor chem wash; reactor "one hour" resin sample; clean-up.
5 to 10	19 14.5	Reactor dump, charge, chem wash and recovery; hopper car loading.
10 to 25	13 11.0	Reactor dump; maintenance on VCM equipment.
25 to 50	5 1.5	Reactor dump; reactor cleaning; maintenance on VCM equipment; VCM rail car unloading.
Over 50	8 1.0	VCM rail car unloading; reactor cleaning; inerts venting of VCM receivers.

* 120 dosimeter samples.

Based on the above data plus information derived from area surveys with the Century OVA monitor an action program to meet OSHA restrictions on personnel exposure is presented in the attached table. This program is based on the premise that we must meet a requirement of 10 ppm TWA and 25 ppm ceiling for employee exposure by October 5.

In addition to the employee exposure restrictions, it has been presumed that OSHA will place a restriction on the VCM content in dried resin. The current CONOCO objective of 1000 ppm by October 5 apparently represents no problem to Oklahoma City since limited tests of our resin indicate VCM contents of 300-800 ppm. However, projects with number 3 and 6 priority will help to better define our capabilities in this area.


E. L. Kieschnick
Process Engineer

ELK:ma

Attachment

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