

CONOCO

CHEMICALS
RESEARCH

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Interoffice Communication

To Distribution
From J. F. Gabbett
Date May 28, 1974
Subject PVC Safety Association Meeting - Cleveland, 5/24/74

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The morning session was devoted to a general discussion on the VCM level acceptable to the attending polymer and monomer companies. Most other companies like Conoco have reached agreement internally on a monomer level which they intend to use in OSHA presentations. All companies intend to seek a TWA. The levels were stated, in some cases vaguely, as follows:

<u>COMPANY</u>	<u>TWA</u>	<u>CEILING</u>	<u>COMMENTS</u>
American Chem.	-	-	(intends to follow Stauffer)
Air Products	20-25	40	(exceedable for short periods)
Borden	-	-	(no comment-still under study)
Certain-Teed	25	-	(ceiling impossible)
Diamond Shamrock Dela. City	25	-	(no comment)
Diamond Shamrock Deer Park	-	-	(not represented)
Ethyl	25	cannot meet 50	(Ethyl has requested assistance from a European company.)
Firestone	-	-	(still studying the situation but feels it cannot meet a 50ppm ceiling.)
Georgia Pacific	-	-	(not in a position yet to comment - is working with Wacker.)
B. F. Goodrich	10-20 5	30 10	(three years)

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<u>COMPANY</u>	<u>TWA</u>	<u>CEILING</u>	<u>COMMENTS</u>
Goodyear	25	50	(based on limited data - will suggest ceiling overrun.)
Great American	40-50	-	(present 50ppm ceiling cannot be met)
Hooker	25-30	-	(50ppm ceiling cannot now be met because of excursions.)
Imp. Oil (Exxon)	5-15	-	(unknown)
Keysor	-	-	(no data, but possibly a 25-30 TWA.)
Olfin	-	-	(no representation)
Pantasote	25	40	(TWA to be based on Tenneco 1000ppm/week plan)
Robintech	20-25	-	(unknown)
Stauffer	25	50	
Tenneco	-	-	(1000ppm for 40 hrs. or 25 TWA weekly 40ppm ceiling)
UCC	25-30	50	(with overrun relief)
Uniroyal	25-30	-	(still studying)

The following miscellaneous comments were also made in the morning session: Air Products feels, based on discussions with Stender, that the proposed standard is not necessary and that it can be overturned if (all) companies make submittals stating objections, including converters. They intend to base their objections on precedent (asbestos case and OSHA handling of the existing 14 carcinogens) and feasibility (a large proportion of the proposed OSHA requirements are not technologically based). It may be presumptive to assume that the proposed standard can be overturned, but the 14 carcinogen precedent could be of value (Federal Register 1/29) as well as asbestos (Industrial Union Dept., AFL/CIO vs. Hodgson. 1-OSHC-1631 (1974). File no. 72-1713, 4/15/74). Several companies stated that they will argue for occasional excursions above an acceptable ceiling providing the TWA maximum is not exceeded. The idea obviously is attractive assuming that a TWA is allowed. At this time, however, nobody has a precise concept of possibly acceptable magnitude.

Three companies (Air Products, Union Carbide and Tenneco) plan to argue for a residual 0.1% VCM in product. They do not feel optimistic however.

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Monomer producers generally were comfortable about a 25 TWA with the exception of Ethyl Corp. who doubts if they can meet the requirement. Ceilings were uncertain because of excursions which occur unexpectedly. Dow outlined for comment the following monomer plant improvement schedule:

25 TWA	7/75
10 TWA	7/76
5 TWA	7/77
2 TWA	7/78

The general opinion of PVC producers was that 5 TWA may be possible for them some distance down the road when a new radical plant could be constructed. 2 TWA would be impossible.

The afternoon session was devoted to a general discussion of the objectionable parts of the proposed permanent standard. The following outline covers the pertinent objectionable areas. In general it was very similar to the Conoco meeting at Aberdeen indicating similarity of opinion.

A. Discussion of Possible Objections to Proposed Permanent Standard

1. Objections to Definitions and Clarification

- a. Contaminated
- b. Regulated Areas
 - i. - daily roster of entry into regulated area
- c. 20-year record keeping

2. Objections to Engineering Controls and Work Practices

- a. Respiratory Protection - Selection from acceptable type based on OSHA recommendations
- b. Protective Clothing Requirements
 - (1) Operators
 - (2) Vessel Cleaners
 - (3) Maintenance
 - (4) Supervision & Others
 - (5) Employees in Regulated Areas vs. PVC/VCM Exposure
(Appears to require further clarification)
- c. Special Medical Surveillance following Emergency Situation w/i 24 hours.
- d. Signs and Labels
 - (1) Substitute "Hazardous to Health" for words "Cancer-Suspect Agent"

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- e. Maintenance & Decontamination
 - 1. Maintenance in full bodysuit and respiratory protection
- f. Transportation Loading & Unloading
 - 1. Question need for respirators
- g. Medical Surveillance
 - 1. Implementation for removal of suspect employees from VCM exposure.
- h. Records
 - 1. Reports to O.S.H.A.
- i. Filing Procedure for Individual Company Objections

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