GENERAL TIRE

# INTER-ORGANIZATION MEMO

TO: Corporate Vinyl Chloride Committee

ATTENTION:

FROM: Bolta Vinyl Chloride Committee

DATE: November 20, 1974

SUBJECT: Questions concerning Vinyl Chloride

1. What is corporate thinking regarding "risk" pay for employees who work in areas which show detectable levels of V.C. monomer irrespective of whether that area is regulated? PLANTS ARE TO BE NON-REGULATED - NO RISK. DONT SET PRECEDENTS.

2. Would a GT&R worker who had a history of extensive or even moderate V.C. monomer contact and who died from concer of the liver be autopsied to establish whether the carcinoma was caused by the monomer? FAMILY MATTER - CO. CANNOT ORDER. What would you say the corporations stand might be in such a matter?

3. Dow, Hooker, Union Carbide, Goodrich, Air Products, Tenneco and Firestone have all appealed or filed suit or otherwise challenged the O.S.H.A. ruling on V.C. monomer levels. GT&R seems to be going the route of quiet cooperation and compliance. Is such the case? NAMED PARTY, WE ARE NOT PARTICIPANT UNDER SPI

4. If O.S.H.A. comes into this plant and after sampling declares the V.C. monomer level to be on the order of say 10 X what our more extensive testing has indicated. What happens now? What can we do? How vigorous a rebuttal should we launch? FIGHT LIKE HELL VIA LEGAL

5. If we have a sampling site that shows V.C. monomer in excess of .5 ppm then the "area" is to be regulated. How would they establish the boundaries of the area? MEASUREMENTS, DIFFUSION PATTERNS

6. Once an area is declared "Not Regulated" what would you expect the monitoring schedule to be? If it were declared to be "Regulated"? - SAME STD.

7. Since the only way that V.C. monomer comes into the plant is entranced in bagged and silo resin wouldn't it be simplist to just monitor these few areas once the plant is determined to have no "Regulated" areas. 30 or 40 monitoring sites lead to a heavy collecting testing and administrating load.

8. What degree of testing will be needed if:
A. we become regulated in one area ——— >0.5 ppm on < quarterly.
B. we become regulated in more than one area >1.0 ppm on < monthly
C. we become non-regulated — stop after January certification tests.

9. What procedure should we take if we become a non-regulated plant but subsequently we find an area which has become over the action level? Do we permanently record our records and inform necessary people without permantly recording data?
Engineering controls and work practices until non-regulated again. Preventive maintenance.

10. When we have an O.S.H.A. inspection for V.C., is the corporate procedure any different? There is one procedure for a regular O.S.H.A. inspection, will a V.C.M. inspection be any different?
No Industrial Hygienist

11. Will the lab be a restricted area because we have pure V.C.M.
Depends on level, duration of testing

12. How do we dispose of the $CS_2$ and V.C.M. after testing?
I'd burn daily. Let evaporate

13. What other Hydrocarbons will come out the same retention time as V.C.M. in the G.C. ?

14. Should we attempt to identify other compound in the charcoal tubes such as M.E.K. T.H.F.? yes

GENC 20706

15. If we encounter a large peak in the front part of the charcoal tube possibly a solvent or plasticizer and V.C. in the back part of the tube is the test valid? Can't foresee this

16. Have comparison tests been run to determine just what precision might be expected of two Sipin pumps on the same person or of a Sipin - Bendix combination?

17. Is there more information available regarding ways to preserve test samples prior to analysis? G.C. adjustments or backlogs could possibly extend the time beyond the recommended holding period.

store @ -4°C, -20°F $\quad \frac{9}{5}C = F - 32$

$\frac{36}{5}$

18. Are repirators available and in adequate supply to continue operations in say one or two areas in this plant if they should be found to fall in a "Regulated" category?

Put out something on respirators. Physical fitness.

19. If O.S.H.A. comes into this plant and after sampling declares the V.C. monomer level to be on the order of say 10X what our more extensive testing has indicated. What happens now? What can we do? How vigorous a rebuttal should we launch?

Report Question

20. If we have some reponsibility for the disposal of vinyl bags printed with a V.C. warning even though the bags are substantially empty is this responsibility voided if the bags are shredded?

21. Has there been a test to establish the V.C. monomer level in the breathing zone of someone using a V.C. monomer propelled hair spray? What was the ppm?

22. Bolta has more that one resin supplier. How should we handle these resins? Some suppliers feel that they cannot comply with new standards?

GENC 20707

23. If empty bags of resins are placed in common dump containers should the container be labeled?

24. Will resin rail cars be labeled with warning signs?

yes

25. What plan of action will be taken regarding the venting of rail cars in transit?

26. Transportation of P.V.C. by rail and on the road. What effect does this have on states, towns and cities, that the vehicle passes through? ,

27. Storage of P.V.C. in bags over a period of time. What is the level of V.C.M.?

0

28. Exhaust of P.V.C. resin in holding vessels and expelling it (V.C.M.) into the atmosphere. What is the safe level, and how long does it remain in the air? Half life is short

TO: Attendees DATE: Nov. 8, 1974

Subject: VCM PROBLEMS

The following are the questions that we need answered:

1. What constitutes a test location? i.e. 18" from a processing unit, or any place where you are releasing VCM and a man could go for an instant?

2. What test should we run?
   a) Grab Method
   b) Personal Monitoring carbon tube
   c) Carbon tube at work site.

3. If we decide that our January 1, 1975 test method is a carbon tube type, what do we do with our grab sample data?

4. What test procedure should we use to analyze the samples to insure meeting the 95% confidence level requirement.

5. How many tests are required at a site or on a person to establish the 95% confidence level requirement for the two samples taken after January 1, 1975?

6. Has the VCM Committee established that 75% of the people on a shift must be tested to comply with the current standard and if they must, will we receive more pumps or can we ignore the Akron directive for taking duplicate samples when the OSHA man arrives?

Do not ignore.

7. How many people do we test under the new standard? All in the department? When running full, there are 100 people roughly to test. This means 200 tests. At a rate of one test/day/pump and 22 work days per month, the best we can get is 154 tests with our seven pumps.

8. When will we receive the known and unknown gas standards?

11/9/74

9. Are our records okay for testing?

10. Are our records okay for documentation of process change?

11. Can we use outside labs to verify our test accuracy? i.e. Pittsburgh Testing, P.P.G., Gulf Research.

yes

12. How do we obtain approval for large capital sums such as $250,000. needed to control VCM ventilation? This would include items such as air make up systems, stack modification, machinery exhaust modification.

13. Is VCM heavy enough that on a normal day it will settle and stay below air intakes?

send - Rockwell Test

14. When will the labeled bags be received and how are we to handle the community P.R.?

Get together w Committee & resolve

15. Is there any new direction on the disposal problem?

16. Do we label our resin silos, "Contains cancer suspect agent" ? What about resin holding hoppers? Drums of resin in the lab? Drums of blend on the floor?

Yes

17. Has the corporate policy changed for customer requests on residual monomer in our products?

No

18. Lab work indicates that Textile Spirits (our J276) contains an ingredient that comes off the same place as VCM on our column. How do we separate the two?

Better columns -

19. How do we handle the question of any contaminates that interfere with VCM analysis with the government?

20. What are the other plant experiences that may help us?

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