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CONDEA VISTA COMPANY
*** CORPORATE SAFETY, HEALTH & ENVIRONMENTAL STANDARDS**

Subject: Use Of Fixed Point Monitors For Occupational Exposure

Issue Date: September 2, 1997

Supersedes: None

Approved By: Harry D. Garrison

Manager Safety, Health & Environment

1 SCOPE

This standard applies to all CONDEA Vista facilities that utilize substance specific "fixed point" monitoring (FPM) systems

2 PURPOSE

This standard outlines the corporate policy for the establishment of alarm, or notification set points for the FPM's used to monitor ambient workplace levels of chemicals for which there are established permissible exposure limits

3 DEFINITIONS

3 1 Emergency an unforeseen abnormal event which endangers the well being of CONDEA Vista employees, contract employees, or visitors on the site, the neighboring community, property or the environment

3 2 Fixed Point Monitors continuous monitoring devices that are fixed in place for the purpose of measuring ambient concentrations in the workplace

3 3 Permissible Exposure Limits limits established by OSHA, or the Company if lower, for an 8-hour or 15-minute time weighted average period or ceiling levels where appropriate

4 USE OF FPM'S

4 1 Personal monitoring is the primary method to be used for evaluating personnel exposure to workplace contaminants. However, where FPM's

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are installed they shall be utilized as a monitoring device to provide an early warning of workplace contaminant levels to minimize the potential for employee exposures exceeding the PEL's or ceiling levels for the contaminants being monitored

- 4 2 The use of FPM's for compliance with environmental leak detection plans or other purposes shall be coordinated with the use for occupational exposure control

1) MOVE LAB FPM
AND UPDATE FPM

2) 1 PPM 8 HOUR

3) 5 PPM ONE TIME

5 FPM ALARM SET POINTS

- 5 1 The FPM system shall be programmed or otherwise utilized to provide a notification to employees when the ambient levels are detected to exceed the eight-hour PEL, 15-minute STEL, or ceiling level

1 ppm (5 ppm)

- 5 2 Other alarm points may be utilized for the purposes of leak detection or emergency response

- 5 3 A written procedure shall be established that describes what to do in response to an alarm to minimize the potential for employee exposure to levels exceeding PEL's or ceiling levels without proper protective equipment, or initiates the appropriate emergency response action if levels detected are at levels constituting an emergency

- 5 3 1 The procedure shall require a response when persistent levels at or exceeding the 8-hour PEL are detected (1 ppm)

- 5 3 2 The procedure shall require a response after the first indication of STEL or ceiling level exceedance (5 ppm)

- 5 3 3 The facility should consider the use of visual or audible alarms in process areas to assist in employee notification of alarm levels

6 SYSTEM DOCUMENTATION AND DATA REVIEW

- 6 1 Documentation of responses to alarms should be kept to the extent necessary to determine that the FPM system and response procedure is being utilized as intended

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K&A 6 2 Documentation for response to alarms for the purpose of occupational exposure control shall be coordinated to the extent feasible with other compliance programs such as VCM NESHAPS

Cmm 6 3 On at least an annual basis facilities shall perform a documented review of the system data to determine if there are process areas consistently exceeding PEL levels. The review shall include documentation of actions taken to assure compliance with substance specific standard requirements including establishment of regulated areas and evaluation of engineering controls

7 EMPLOYEE TRAINING

Cmm 7 1 Employees shall be trained in the FPM alarm procedure

7 2 Training shall be conducted at a frequency determined by the facility that will maintain an understanding of the response procedure

7 3 The results of the reviews conducted under 6 3 shall be communicated to employees

8 FIXED POINT MONITOR PREVENTATIVE MAINTENANCE

IBA 8 1 Facilities shall establish a preventative maintenance program for the FPM systems that verifies the integrity of the analytical instruments and the sampling system

8 2 This shall include periodic calibration by introducing known contaminant levels at the field sampling points

9 IMPLEMENTATION

9 1 Facilities with existing FPM data acquisition capabilities shall have systems in place to conform to this standard by 6/30/98

9 2 Facilities without FPM data acquisition capabilities shall have systems in place to conform to this standard as soon as possible but no later than 6/30/99 if funds are not available in the FY 97/98 budget year