

Monsanto

REGIONAL OFFICE

John E. Fox - Texas City, Texas

DATE June 4, 1974

SUBJECT

REFERENCE

TO G. A. Danner:

cc. R. V. Butz
R. W. Flint
C. L. Gilmore
E. H. Jones
J. G. Trafton
H. J. Corbett-S. L.

As per your request, I have tried to make a quick excerpt of the proposed OSHA standard on Vinyl Chloride along with the probable problem areas that we will need to work on if the proposal becomes law as now written.

1. The proposed standard for employee exposure to VC is set at no detectable level by an analytical method capable of detecting VC concentrations of 1 ppm.
2. Access to areas handling, storing, reacting or releasing VC would be limited to authorized employees only. This would include the Department 60 block, VC unloading, tank car washing and loading, truck loading, drum loading and any outside storage warehouse. The areas would be posted as cancer-suspect agent area. A daily roster of entry shall be made and maintained and kept for at least 20 years. A program of medical surveillance shall be required for all employees entering the regulated areas. This would entail a blood test and doctor examination for everyone who entered at least one time during each year. If one or more of the tests are abnormal, the test must be repeated. If the abnormalities persist, the employee must be removed from the area until a complete individual medical workshop is instituted and evaluated by a medical doctor.
3. All personnel entering the regulated area would be provided with full-body protective clothing, footwear or shoe covers, gloves and headcoverings. Since food and beverages would be prohibited in the regulated area, personnel would be required to remove the clothing before smoking or obtaining food or drink at a separate facility. Showers would be required after final exit of the day. Shower facilities, additional change room and locker facilities and a separate kitchen and smoking area would have to be provided. Unless throw-away clothing is used, a laundry probably would be required.
4. A program of air monitoring would be required. This will require frequent monitoring of employees on an individual basis and probably also fixed area continuous monitoring. Anytime a spill occurs (level not defined but probably at 1 ppm), you would institute engineering controls and work practices to reduce the VC to undetectable levels. These periods would also require temporary respiratory protection. There shall also be tests made for process or equipment leaks. Frequency shall be such as to insure integrity of equipment.

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5. Each spill or release of VC (level not defined) would require detailed written reports to OSHA. Also, a report must be written to each employee exposed (level also not defined but probably low). Medical treatment and medical surveillance would be started on each affected employee within 24 hours.
6. Maintenance or repair operations on contaminated systems, including tank entry, shall require whole-body, air-supplied suits impervious to VC along with an approved respirator. When an employee enters a vessel, another employee similarly equipped shall be present. They are required to shower after removing the protective suits. Local exhaust ventilation shall be used when opening vessels or piping (no mention of contamination level) and vented from all occupied areas.
7. Employees loading or unloading VC shall wear approved air-supplied respirators. Inert gas purging will be used on transfer lines and effluent returned to process or flared.
8. Waste resins contaminated with VC shall be placed in closed containers pending disposal or decontamination. Appropriate procedures shall be developed and implemented for the decontamination or disposal of all such waste material. All containers shall be labeled as cancer-suspect agent.
9. All EVC product containers (drums, tank cars and trucks) containing detectable levels of VC shall also be labeled as cancer-suspect agent.
10. Written requirements for decontamination, work procedures and entry to all equipment will be required.
11. Collection and control of disposal of all waste streams and washings from such areas as filter changes, screen changes, tank cleaning, pump decontamination, tank car and tank truck cleaning, drum loading filters must be provided. Will sewer disposal be allowed?
12. Probable removal of the drum loading facilities from the same building used for lactic acid drum loading will be required.
13. Regulated areas in the monomers control lab and research will be required if they continue to handle EVC. This would require isolated work space, clothing, showers, lockers and change rooms.
14. NIOSH also recommended that "no woman who is pregnant or who expects to become pregnant should be employed directly in VC monomer operations." This recommendation may affect those working on EVC in the laboratories.
15. Would suggest that we prohibit use of outside contractors and construction personnel inside the regulated area since they would have to be included in the medical surveillance program.


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