



INTER-ORGANIZATION MEMO

File

TO: ASHTABULA
ATTENTION: Robert Landrie/Harlan Jewett
FROM: James Arvin
DATE: June 1, 1981
SUBJECT: ASHTABULA PLANT -
VINYL CHLORIDE LEVELS

It appears the overall averages of vinyl chloride levels at Ashtabula are falling. However, there are still some 8-hour averages from 33.4 to 60.9 ppm indicated by the Bendix sampling units.

I feel the high levels are primarily due to operators not following standard practices and not responding to high levels indicated by the Bendix machine.

For example, on May 27, 1981 I was in the plant at 6 a.m. and the blue light indicating levels above 15 ppm was on. It had been on for almost the entire shift. No one requested a leak detection inspection from Quality Control to find the problem. Nothing was done until I requested an inspection at 10:30 a.m. The Quality Control men found two leaks - one upstairs where the slurry transfer lines had not been capped according to standard procedure. Lines were capped and levels went down. The other leak was a hammer blind on reactor 312. This was repaired on the afternoon shift after the reactor was brought down.

There is lack of enforcement in requiring the wearing of respirators for levels over 5 and 15 ppm. On May 27, 1981 when the blue light was on I observed operators and laborers not wearing the in-line respirators or 10 ppm masks as required in the reactor building.

Housekeeping could help keep the levels down. High levels (15 ppm) were found at the slurry transfer lines and some resin had been spilled on the floor. I requested a laborer to work the slurry down and the levels dropped.

Education to follow the standard procedures, such as capping the slurry transfer lines, tightening down gaskets and seals, etc., is needed.

In February, 1980 Ashtabula was cited by OSHA for employees not wearing respirators and high levels of vinyl chloride in the reactor while cleaning and to exposure above the time-weighted average in the polymer building. We recently requested an extension of items 1-A and 1-B. Therefore employees must wear respirators, as required, until levels are brought down...not only to protect them from exposures, but to prevent a repeat citation.

James Arvin

xd

Attachment

cc: R. Garber

bcc: D. Jeffrey

GENC 003169

CITATION and NOTIFICATION OF PENALTY

1 ISSUANCE	2 OSHA NUMBER
4/8/80	P4561 003
3 REGION	4 AREA 5 PAGE
5	1680 2 OF 2

**PENALTIES
ARE DUE
WITHIN 15
DAYS OF
RECEIPT
OF THIS
NOTIFICATION
UNLESS
CONTESTED
(See enclosed
Booklet)**

**This Section May
Be Detached
Before Posting**

TYPE OF VIOLATION(S)	CITATION NO
Other	1

TO: General Tire & Rubber Company
Middle Road, P. O. Box 68
Ashtabula, Ohio 44004

2/8-4/3/80

Middle Road, P. O. Box 68
Ashtabula, Ohio 44004

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER	STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED:	DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
		the Bendix system indicated a concentration of 5ppm in the area.		

GENC 003170

GENC 003170

14 AREA DIRECTOR

LESLIE W. MICHAEL, PH.D.

NOTICE TO EMPLOYEES — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL -- The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION – The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

50
TOTAL PENALTY
FOR THIS
CITATION

Make check or Money Order Payable To
"DOL-OSHA"
Indicate OSHA Number on Remittance

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 REV. 5/76

DUPLICATE

CITATION and NOTIFICATION OF PENALTY

Cleveland Area Office
1240 East Ninth Street, Room 847
Cleveland, Ohio 44199
216/522-3819

ISSUANCE DATE 4/8/80	OSHA NUMBER P4561 1003
REGION 5	AREA 1680
PAGE 1 OF 2	

TYPE OF VIOLATION(S) Other	CITATION NO. 1
-------------------------------	-------------------

INSPECTION DATE:

2/8-4/3/80

INSPECTION SITE:

Middle Road, P. O. Box 68
Ashtabula, Ohio 44004

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

PENALTIES ARE DUE WITHIN 15 DAYS OF RECEIPT OF THIS NOTIFICATION UNLESS CONTESTED (See enclosed Booklet)

This Section Must Be Detached Before Posting

TO: General Tire & Rubber Company
Middle Road, P. O. Box 68
Ashtabula, Ohio 44004

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED; DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALT
The violations described in this citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below. 1A 29 CFR 1910.1017(c)(1): Employees in the polymer building, cleaning the reactor vessels, were exposed to an 8-hour time weighted average airborne concentration of vinyl chloride in excess of one part per million standard. The employee working inside the vessel was exposed to vinyl chloride monomer 8.5 times the standard. The helper was exposed to 3.1 times the standard. 1B 29 CFR 1910.1017(f)(2): Employee(s) exposures to vinyl chloride were not controlled as provided in paragraph(s) (c)(1), (c)(2) or (c)(3) of this section by the utilization of immediate feasible engineering controls to reduce the exposure to the lowest practical level: Second floor, polymer building, (paragraph (c)(1)). 2 29 CFR 1910.134(d)(2)(ii): Suitable in-line air purifying sorbent beds and filters were not installed in compressors to further assure breathing air quality: The air supply lines were of such length that the present sorbent beds and filters were not effective in removing particulate from within the line. 3 29 CFR 1910.134(c)(4): Frequent random inspections were not conducted by a qualified individual to assure that respirators were properly selected, used, cleaned and maintained: (a) The lab technician that's responsible for checking the reactor was not wearing his positive pressure respirator in a manner to insure a proper fit. (b) The compounder was not wearing his single use respirator as required by company regulation, when	10/8/80 10/8/80 Immediately Immediately	0 0 0 0

14 AREA DIRECTOR

LESLIE W. MICHAEL, PH.D.

Leslie W. Michael

NOTICE TO EMPLOYEES — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION — The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

CITATION AND NOTIFICATION OF PENALTY

OSHA-2 REV. 5/76

DUPLICATE

ON LAST P
TOTAL PENA
FOR THIS
CITATION
Make check or M
Order Payable
"DOLOSH"
Indicate O
on Remitt...