

TOG: JCL: MMG: RF  
XF: Research

TO: Joyce Cox

FROM: Tom Grumbles  
DATE: August 29, 1985

Interoffice  
Communication

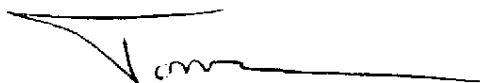
SUBJ: ETHYLENE DICHLORIDE EXPOSURES

VISTA

For your reference, I have enclosed some summary information regarding the health effects of EDC. I have not been able to find a specific odor threshold number for EDC, however, it is well recognized that EDC can be detected by most persons in the 3-5 ppm range. In other words odor detection would not necessarily indicate excessive exposure levels.

The current OSHA permissible exposure limit is 50 ppm for an 8-hour time-weighted average. The ACGIH TLV (non-regulatory exposure limit recommendation) is 10 ppm. We operate with a 5.0 ppm exposure limit guideline at the Lake Charles VCM plant.

I have spoken with Robert Martin regarding the use of EDC in the lab. I have asked him to review EDC handling and exposure potentials in your lab.



Thomas G. Grumbles

ajo/7

Enclosure

cc Robert Martin

VVV 000016670

IGG: JGL: MMG: RF

XF: Aberdeen

TO: Al Sather

FROM: Tom Grumbles

DATE: August 29, 1985

Interoffice  
Communication

SUBJ: ABERDEEN PLANT INDUSTRIAL HYGIENE PROGRAM ASSESSMENT

VISTA

Enclosed is the revised criteria for Vista Industrial Hygiene Program Assessment. There are some changes in format from the Conoco Chemicals version, however, the basic program is the same.

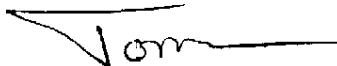
As we discussed, the plant portions of the assessment will be on September 24 and 25. To facilitate the plant visit, I would appreciate you sending the information listed below to me by September 16.

1. Sampling Data for the last 12 months. This should be actual data and summaries but not summaries only. The data should be for VCM, lead, and other routinely sampled chemicals.
2. Any available written reports, etc., regarding recommendations and actions taken from the 1983 plant audit.
3. Written plant programs for respiratory protection and air sampling strategy and procedures.

Please arrange to have the department heads available for interview during the plant visit. We will also want to talk to various maintenance and operations personnel, but this will be done at random.

The assessment will be conducted by Keith Fogg, Dr. Drumwright, Michele Goodreau and myself.

Please let me know if you have any questions at this time.



Thomas G. Grumbles

ajo/7

cc Keith Fogg  
J. R. Drumwright  
M. M. Goodreau  
John Friend

VVV 000016671

VISTA CHEMICAL COMPANY  
INDUSTRIAL HYGIENE PROGRAM ASSESSMENT PROCEDURE

August 1985

BASIC GOALS

1. To assure that all feasible steps are being taken to adequately protect the health of Vista Chemical Company employees.
2. To assure compliance with federal and local regulations.
3. Assess adherence to company policies and good practice.
4. Identify areas of need based on the above and make recommendations to aid in meeting those needs.

PROCEDURE

Each plant will be audited at least every two years with actual frequency determined by need. The audit will be conducted in three phases as outlined below.

1. Pre-Audit - Prior to the assessment the plant will be contacted to arrange a time of visit agreeable to all. The time spent in the plant will vary dependent on size of the plant and complexity of the existing program.

The plant to be assessed will be notified of the audit criteria to enable preparation of necessary materials for review and assure the availability of key personnel to be interviewed. Requests may be made for specific information or data to be sent to the assessment team for review prior to the plant visit.

2. Site Visit - The on-site assessment will consist of two basic parts.
  - A. The majority of the audit will be performed "in-office". An opening conference will be held with management and other affected staff personnel to describe the purpose and process of the audit. The major activity will involve review of written programs, air sampling data, recordkeeping, and overall administration of the program and progress on recommendations from previous plant assessment reports. The specific aspects of this review are attached as Appendix I.
  - B. The second phase of the audit will involve a walk-through inspection of the plant. This walkthrough will be done in OSHA style to identify any potential areas of non-compliance as well as allow for an assessment of the administration and success of written programs.

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- C. A closing conference will be held with appropriate plant management before the assessment team leaves the plant. Results of the assessment, preliminary recommendations, report format and distribution will be discussed.
3. Post-Audit - A written report of the assessment findings will be addressed to the Plant Manager, with a copy to the Vice President of Operations, Manager - Medical, and other company management deemed appropriate in (C.) above.

ASSESSMENT TEAM:

The assessment will normally be conducted by a member of the Houston Biomedical and Environmental Affairs department, the Manager - Medical, and Safety Director from another Vista plant.

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## INDUSTRIAL HYGIENE ASSESSMENT

### ON-SITE CRITERIA

The following items will be considered where applicable to the given facility or operation under review. This list is a guideline and not intended to be all inclusive or totally limiting.

#### A. Program Administration

1. Definition of Responsibilities (Departments, people)
2. Structure of the program
3. Administration of the program
4. Communications (in-plant, external)

#### B. Review of Written Programs

1. Chemical Exposure Abatement Programs
2. Written determinations
3. Portions of Safety Procedures with reference to industrial hygiene procedures (if applicable)
4. Other specific programs required by applicable OSHA standards (i.e., VCM, EtO).

#### C. Plant Recognition of Hazards

1. Chemicals present in the plant
2. Current lists of chemicals
3. Availability of MSDSs or similar information on chemicals in the plant
4. Communication with the purchasing group
5. Review of new chemicals or new uses of chemicals in the plant
6. Periodic review/updating of material

#### D. Hazard Evaluation Programs

1. Sampling program review
  - a. What agents/chemicals are sampled
  - b. Sampling methods
  - c. Sampling frequency
  - d. Criteria for sampling frequency
2. Program administration
  - a. Placement of sampling devices
  - b. Observation of sampling
  - c. Job/task information for overexposure determinations
  - d. Sample retrieval and labeling
  - e. Sample storage/custody
3. Sample analysis

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4. Reporting of results
  - a. Format
  - b. Distribution
5. Data recordkeeping practices/systems
6. Sampling equipment
  - a. What's available
  - b. Calibration of equipment (frequency, records, methods)

E. Hazard Control

1. Review of specific control procedures/devices
2. Input and review of proposed process or equipment changes
3. Evaluation of newly installed controls
4. Ventilation systems review
  - a. Needs and use
  - b. Testing of devices (hoods, exhausters, etc.)
  - c. Maintenance of systems
  - d. Records of inspections
5. Respiratory Protection Program
  - a. Review of program for compliance with OSHA regs
  - b. Administration of program
  - c. Recordkeeping
6. Other personal protective equipment
  - a. Need
  - b. Selection
  - c. Availability and use

F. Review of Exposure Records

1. Regulatory compliance
2. Compliance with company policies
3. Recordkeeping

G. Education Programs

1. Present program review
2. Frequency of training
3. Administration of programs

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H. Medical Surveillance Programs

1. Administration of program
2. Results of review of program done by Manager - Medical

I. Storage and Handling of Hazardous Materials

1. Facilities
2. Equipment used
3. Methods used
4. Labeling/identification in plant

J. General Sanitation

1. Eating facilities
2. Restrooms
3. Change rooms
4. Potable water supply
5. General housekeeping

K. Employee Awareness of Hazards

1. Personnel interviews to be conducted
2. Work practices observed

L. Miscellaneous

1. Sign-posting in plant
2. Light levels in work areas
3. Marking of safety showers/evacuation areas

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