

CHEMICALS



INTEROFFICE / LAKE CHARLES

TO Distribution DATE March 8, 1990
FROM Clark S. Graybill
Clark SUBJECT OSHA EDC Regs.

Thank you for your attendance at our meeting on Tuesday to review the OSHA EDC issue. The following is a brief summary of some of the key points that were presented.

1. The new OSHA limits (1 ppm personnel exposure for 8 hours TWA and 2 ppm for 15 minutes) are currently in effect.
2. We are operating under special temporary provision which allows for the use of respiratory protection to meet the new exposure limits. Engineering controls will need to be in place by December 31, 1992 to meet the new levels without respiratory protection.
3. The proper use of respiratory protection for compliance with OSHA EDC limits has certain "negotiated" conditions which PPG must be aware of and comply with. This is brought about by the fact that EDC's odor threshold is 6-10 ppm. Therefore, a user of respiratory protection cannot smell breakthrough until overexposed. Strict guidelines for the proper use of respirators for EDC must be communicated to all users of respiratory protection in order to comply with OSHA. Further information should be obtained from Ron Williams or Max Hekmat.
4. Loren Anderson of General Office has been given overall responsibility for the OSHA EDC issue for PPG.
5. The Vinyl Institute has filed suit in an attempt to get OSHA's regs thrown out. This is not likely to succeed. History has shown that health based regulations are almost impossible to overturn regardless of the technical issues. PPG is proceeding, for several good reasons, to engineer proper controls which will allow compliance with this regulation.
6. Personnel monitoring is continuing in order to identify exposure levels in the plant.
7. Nelson Perez is in charge of an engineering project to deal with the issue. The objective of this project is to install facilities to comply with the OSHA regulations. The project is in the initial data gathering stages. The intention is to install a customized system for each individual unit which is aimed at the problem areas identified by monitoring. After installation, personnel monitoring will be used to judge the effectiveness of the changes.

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8. PPG will be in charge of organizing a symposium which will draw engineers from Vinyl Institute member companies (PPG, Dow, Occidental, Vista, BFGoodrich, Borden, CertainTeed, Air Products, Georgia-Gulf, and Shintech) together to share "off-the-shelf" technical information which will be used to comply with the regulations.
9. Support from each operating unit will be an integral part of the success of the engineering controls.
10. Revisions will be necessary to both our operating equipment and our operating procedures.

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