


**UNION
CARBIDE**

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

TO (NAME) Mr. R. L. Frantz, 515
 COMPANY Mr. K. E. Ross, 515
 LOCATION Mr. C. E. Fry, 514
 Mr. J. E. Giffin, 514

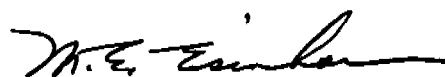
DATE July 12, 1974

COPY TO Mr. R. N. Wheeler, 514
 Dr. N. L. Zutty, NYO
 Dr. A. B. Steele, NYO
 Mr. J. L. Carvajal, 514
 Mr. R. W. Sesler, 515
 Mr. D. E. Deese, 515
 Mr. J. B. Leverton, 515
 Mr. D. A. Dechman, 515
 Mr. G. F. Tacquard, 515

SUBJECT VCM Levels

The various chromatographs for monitoring VCM exposure in the production units have now been in operation for a long enough period (with the exception of the solvent unit at Texas City) that excursion levels as well as area TWA exposure levels should be pretty well established. In addition, the chronic problem points in terms of emissions, equipment, and procedures should be well defined. Accordingly, this is to request that these problem areas be documented and that an orderly program for reduction in emissions be formalized in writing. Priority will, of course, be given to eliminating those emissions that cause personnel to be placed in air masks. Also, please advise to the best of your ability the maximum 8-hour TWA exposure level for your unit. Actual Industrial Hygiene measurements might be of more value here than the VFA's. What level of excursions are showing up on the VFA's? Although we wouldn't knowingly expose anyone to over 50 ppm, are there enough readings over 50 that personnel might be exposed unknowingly?

This data is aimed at "getting our ducks in a row" for the pending OSHA permanent standard that should be issued about September 5 to be effective October 5. ~~Copy to, [redacted]~~ be appreciated.



M. E. Eisenhour

MEE/ebm

UCC 090700

**UNION
CARBIDE**

INTERNAL CORRESPONDENCE

RECD.

Medical Occup Health Nsg
W.H. 9/1974
UC 149-2
VC-

PLANT MGRS. FILES

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

TO (NAME) Mr. M. E. Eisenhower

DATE July 16, 1974

COMPANY

LOCATION TEXAS CITY PLANT

COPY TO Dr. A. B. Steele, NYO
Dr. N. L. Zutty, NYO
Mr. D. L. Goris, 515
Mr. R. W. Greenwood, 515
Mr. D. D. Robinson, 511
Dr. W. R. Manning, 511
Mr. J. T. Tannos, 515
Mr. R. W. Sesler, 515 ✓
Mr. R. L. Frantz, 515
Mr. K. E. Ross, 515
Mr. J. F. Dodd, 511
Mr. C. E. McConnell, Jr., 511
Mr. F. L. Keller, 515
Mr. D. R. Reem, 515
Mr. W. P. Reeves, 515
Mr. D. L. Engle, 515
Mr. W. E. Burndrett, 519
Mr. G. M. Everitt, HO

SUBJECT Vinyl Chloride in Texas City
Plant Vent Stream

Thanks for your letter of July 5. We will seriously consider VCM recovery from the Suspension Unit and Amines Unit vent streams.

We will have to incinerate these streams even with VCM recovery scrubbing systems to avoid HCl plume problems. Our main effort is directed toward installation of an incineration system ahead of the May 31, 1975 state deadline.

Evaluation of VCM recovery by butyl acetate absorption is in progress now and will continue as a separate and parallel effort; but without the critical May 15 deadline.

A snapshot of our current thinking is to incinerate the two streams in existing, idle Dowtherm boilers. A small absorber/stripper system at the Suspension Unit can probably be justified. VCM recovery of the

UCC 090701

Amines Unit stream will be more difficult to justify as the volumes are lower and the many impurities could cause problems.

We will keep you in touch on our progress. Let me know if you disagree with our approach.

A handwritten signature in dark ink, appearing to read "D. A. Dechman", is written over a horizontal line.

D. A. Dechman

/cs

UCC 090702

To: Mr. D. L. Engle

Date: July 17, 1974 *Waltham*
Eng-VC

cc: Mr. D. A. Dechman
Mr. M. E. Eisenhower
Mr. R. L. Frantz
Mr. K. E. Ross
Mr. G. F. Tacquard

PLANT MGRS. FILES

~~Mr. W. R. van der Hoeven/J. B. Leverton/D. Deese~~
From: R. W. Sesler

Re: OSHA Citation
Vinyl Chloride July 15, 1974.
S-2219-88-74
Area 3280 Region 6

Current status is as follows:

Copies have been provided to Ken and Bob for posting and all recipients of this note have a copy of the citation or have a copy routed to them.

Ken and Bob will have the responsibility for follow-up and communications on planning August 22, 1974 and abatement January 22, 1975.

UCC 090703

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

CSHO NO.	OSHA-1 (N)
S-2219	88
AREA	REGION
3280	6

U. S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
2320 LA BRANCH, ROOM 2118
HOUSTON, TEXAS 77004
PHONE: (713) 226-5431

TO: Union Carbide Corporation
ATTN: Mr. D. L. Engle, Plant Mgr
Chemicals and Plastics Division
P. O. Box 471
Texas City, Texas 77590

Subject: Citation(s) for Alleged Occupational Safety and Health Violation(s)

An inspection of a place of employment has revealed conditions which we believe do not comply with the provisions of the Occupational Safety and Health Act of 1970, (29 U.S.C. 651 et seq.). The nature of such alleged violation(s) is described in the enclosed citation(s) with references to applicable standards, rules, regulations and provisions of the said Act. These conditions must be corrected on or before the date shown to the right of each alleged violation therein.

The Act requires that a copy of the enclosed citation(s) be prominently posted "in a conspicuous place upon receipt" at or near each place a violation referred to in the citation occurred. It must remain posted until all violations cited therein are corrected, or for 3 working days*, whichever period is longer. A sufficient number of copies of the attached citation(s) should be prepared to permit posting in accordance with the requirements of the Act. The Act provides for penalties for violation of the posting requirements.

You are hereby notified, or will soon be notified, whether or not penalty(ies) will be proposed as a result of the cited violation(s). You have the right to contest any or all parts of either the citation(s) or the proposed penalty(ies) before the Occupational Safety and Health Review Commission. The Review Commission is an independent agency with authority to issue decisions regarding citation(s) and proposed penalty(ies). If you do contest, you should submit a letter to the Area Director at the address shown above within 15 working days* after receipt of the certified mail notice regarding proposed penalty(ies). If you fail to contest within the 15 working day period, the citation(s) and the penalty(ies) as proposed, shall be deemed to be a final order of the Review Commission and not subject to review by any court or agency.

If an employer contests the citation, the abatement period specified therein does not begin to run until the date of the Commission's final order in the case *PROVIDED* the employer initiated his contest in good faith and not solely for delay or avoidance of penalties.

You have a right to request a discussion with the Area Director concerning any results of the inspection (abatement dates, citations, penalties, etc.). Please direct correspondence to, or call, the Area Director at the address shown at the top of this letter. A request for an informal discussion cannot extend the 15 working day period allowed for filing a notice of contest. Therefore, a request for an informal discussion should be brought to the attention of the Area Director prior to the end of the 15 working days allowed for filing a notice of contest, preferably as soon as possible.

An employee or representative of employees may file a notice (letter) to contest the reasonableness of the time stated in the citation for the abatement of the alleged violation(s).

Alleged violations that are not contested shall be corrected within the abatement period specified in the citation. A followup inspection may be made for the purpose of ascertaining that the employer has posted the citation(s) as required by the Act and corrected the alleged violations. Failure to correct an alleged violation within the abatement period may result in further proposed penalties for each day the alleged violation has not been corrected. Timely correction of an alleged violation does not affect the initial proposed penalty.

Correction of alleged violations which have an abatement period of 30 days or less should be reported in writing to the Area Director promptly upon correction. Reports of corrections should show specific corrective action on each such alleged violation and the date of such action. On alleged violations having an abatement date of more than 30 days, a written progress report should be submitted each 30 days. The progress report should detail what has been done, what remains to be done, and the time needed to fully abate each such violation. When the alleged violation is fully abated, the Area Director should be so advised.

The Act provides that whoever knowingly gives false information is subject to a fine up to \$10,000, imprisonment up to 6 months, or both.

If you wish additional information, you may direct such request to the undersigned at the address shown above.

*Under the Occupational Safety and Health Act, the term "Working Day" means Mondays through Fridays but does not include Saturdays, Sundays, or Federal Holidays.

3. Citation(s) Enclosed	
Quantity	Pages
1 Nonserious	1
1 Serious	
1 Willful	
1 and/or	
1 Repeated	
4. Notification of Proposed Penalty enclosed	
☒ Yes ☐ No	

U.S. Department of Labor
by Area Director

s. *R. Davis Payne*
THOMAS T. CURRY
Date *July 15,* 19 *74*

UCC 090704