

Number	PARAGRAPH	OBJECTION	GROUNDS
1	(b) (9) "Exposure" means actual contact with vinyl chloride when unprotected by required personal protective equipment and clothing.	Limits of time and amount of vinyl chloride necessary to constitute an "exposure" are not included in the definition. Also there is no mention of vinyl chloride gas versus vinyl chloride liquid "exposures". The definition of "exposure" could be accepted if 1910.93q (e) (2) did not require "any exposure" to be determined with a confidence level of 95 percent.	It is obviously not feasible to determine actual contact with an infinitely small amount of vinyl chloride for an infinitely short time with a confidence limit of 95 percent. Either the definition of "exposure" or the requirements in regard to monitoring or both should be changed. The definition of "exposure" also relates to 1910.93 (g) (2) pertaining to reporting of incidents involving "potential employee exposure." Everything that is done in a polyvinyl chloride polymerization plant has the "potential" for actual contact with vinyl chloride. It is suggested that the term "Exposure" could be defined as follows: "Exposure" means actual contact with vinyl chloride gas in a concentration exceeding the allowable limit in the work environment, or actual contact of the skin with sufficient vinyl chloride liquid to result in vinyl chloride gas concentrations exceeding the allowable limit in the air adjacent to the employee having such contact.

CLI 5208

NUMBER

PARAGRAPH

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GROUND

2 (h) Protective clothing (1) employees entering regulated areas shall be provided full-body protective clothing footwear or shoe covers, and gloves, at no cost to them, and required to wear it while in the regulated area.

The specification "protective against vinyl chloride", as defined in (b) (13) is not sufficient for an employer to provide to a supplier of clothing to be sure of meeting the requirements of the proposed regulation.

An ordinary loosely fitting coverall will stop droplets of vinyl chloride liquid from contacting the skin: the droplet will vaporize from such clothing into the surrounding air since the boiling point of vinyl chloride is -13.8°C ($+7^{\circ}\text{F}$).

3 (h) (2) Where polyvinyl chloride powder containing detectable levels of vinyl chloride is handled, employee shall also be:

Would clothing that would prevent contact of vinyl chloride liquid in amounts reasonably likely to be encountered in normal operations be, normally sufficient, and a different type of protective clothing in case of accidents? Does protective clothing have to protect against exposure (actual contact at any concentration) or only keep the vinyl chloride gas concentration between the clothing and the skin below the approved limit of vinyl chloride?

4 (i) Provided and required to wear head coverings;

"head covering" is non-descriptive.

Generally, hard hats are worn by employees, and they are not always compatible with the use of respirators. Specifically, what type of "head covering" may be used to satisfy this requirement?

5 (ii) Required to remove all protective clothing at

Vinyl chloride has a very low boiling point

Since vinyl chloride has a low boiling point (-13.8

OL 5209

each exit from the regulated area;

and will readily vaporize, therefore, flow will sufficiently decontaminate any contaminated areas, making it unnecessary to remove all protective clothing at each exit from the regulated area.

(+7°F), clothing that has been contaminated by one or a few drops of vinyl chloride liquid will be decontaminated by normal evaporation.

and (iii) Required to shower after the last exit of the day.

Unnecessary - vinyl chloride vaporizes rapidly, therefore, a shower would not help to protect against exposure.

The objective of the proposed regulation is primarily to protect against excessive exposure to vinyl chloride. Since there would be no vinyl chloride present by the time an employee reached the shower room, a shower would serve no useful purpose.

A shower may be desirable for personal hygiene reasons, but not for the regulation of exposure to vinyl chloride.

(3) Clean protective clothing shall be provided whenever contaminated or soiled, but not less frequently than weekly.

Laundrying for the purpose of decontaminating clothing is unnecessary as vinyl chloride vaporize before laundrying can be accomplished.

Physical characteristics of vinyl chloride are such that decontamination can be accomplished by natural evaporation.

Contaminated clothing shall be decontaminated before reuse by removal for laundrying or disposal.

(h) (3) Storage or consumption of food or beverages, storage or use of smoking

Unnecessarily restrictive.

The rapid rate of evaporation of vinyl chloride precludes any likely hood of exposure by ingestion

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	or non-food chewing products, and the storage or application of cosmetics are prohibited in regulated areas.		or by skin absorption. Therefore, it seems unnecessarily restrictive to deny the use of such material in areas where the atmosphere is normally below the allowable limit of vinyl chloride.

OLI 5211