



ESCAMBIA PLANT
INTEROFFICE MEMORANDUM

To: E. A. Primeau
From: D. H. Francke
Re: Progress on Compliance Efforts
of the Escambia PVC Plant

Date: 15 April 1976

Copies: J. T. Barr
J. M. Diamond
J. E. Greasel
~~R. E. Jones~~
J. C. Novak
J. F. Odom
R. H. Schenk
W. R. Schofield
F. E. Sommer
R. R. Spiegelhalter
W. J. Stueben

This memo is a status report on actions suggested by the writer's letter of 13 February 1976, Escambia PVC Plant, OSHA VCI Regulation Compliance. The writer hopes that this memo will serve as a reminder to those persons responsible, who have not done so, to provide in writing as soon as possible the necessary information to comply with the standard. The following summary includes actions taken and actions still unresolved and discusses specific personnel the writer feels should take such actions.

1. Protective Clothing

- A. Coveralls have been received and are in the process of being stenciled for use. Issuing procedures have been established.
- B. A washer and dryer are being connected for use. As soon as they are operational, the issuing of coveralls will begin.
- C. The use of rain suits has been mandatory since 1 March 1976 in cases of line opening, vessel opening, and tank car connecting and disconnecting.

2. Training

Training sessions have been held for the necessary personnel to present future training sessions. Many of the first training sessions have been held, mostly by maintenance. Operations training will be

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annually updated as required since those given in April, 1975. Training for other groups should proceed as necessary for completion prior to the need for entry into the PVC Plant. Plans for the use of video tape training has been temporarily delayed at the present due to problems in purchase justification of equipment.

Record keeping of the training is proceeding well. All instructors who have given sessions seem to be providing records quickly.

3. Signs and Labels

A supply of replacement signs has been received, and label and sign upkeep continues.

4. Records

The procedure for regular updating and issuance of Authorized Personnel Lists has been established and helps in determining those qualified for entrance to PVC. These rosters can be reproduced at any future date according to the MID group. We are still in need of written clarification as to which records need to be maintained and the retention length of such records. At present, records will be maintained as follows unless the writer is notified to the contrary in writing.

- A. Area Monitoring: Area summary reports for one year with files updated monthly.
- B. Personnel Monitoring: Data entry sheets for one year, updated monthly, with summaries in the monthly reports.
- C. Authorized Personnel Lists: The most recent list plus lists one month prior. This file is to be updated upon receipt of each new list.
- D. Area Access: At present, one year of input forms and computer logs. As soon as a summary report can be developed, one year of monthly summaries, updated monthly.

5. Reports

We are still in need of a written procedure for reporting a massive release. This needs to include not only the level, which defines a massive release, but also specific personnel to be notified when such a release occurs. This procedure must conform to regulation and should be standard for all APCI facilities. It should, therefore, be established

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by someone at the Group or Corporate level.

6. Respirators

A good respirator program has been established by our maintenance department and at this time seems to be working quite adequately. The required training is being done through the training sessions.

7. Medical Program

The writer still has not received a written response to any of the questions put forth in his first memo. Of particular concern are:

- A. The issuance of a fitness statement to each employee
- B. A written procedure listing personnel to contact and actions to be taken in the event a person is exposed to a massive release
- C. The timing of physicals for personnel not currently tested but who must enter PVC due to work requirements

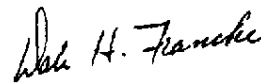
The writer has little control over these areas, even though they affect the overall compliance with the OSHA regulation under which the PVC Plant must operate. The actions and procedures must be determined, and the procedures for items 7 B and C, which affect the PVC Plant, must be provided to the PVC Plant in writing. If this is not done, APCI could be in violation, especially in the case of a massive release.

8. Accuracy of Analysis

Initial tests on the lab analysis accuracy for VCM monitoring have been completed and the results issued. Additional tests will be completed when new standard gases are received.

Conclusion

Although much work has been done by many people, there are still a few areas in which little, if any, progress has been made. In these areas, the PVC Plant is, at least in some cases, "flying blind" due to a lack of established procedures. These procedures must be established by persons other than the writer because they involve areas over which the writer has no control. With the exception of those areas pointed out above, the necessary information and actions have been received and taken. Work is in progress on putting this information together in a single source to aid in an OSHA inspection.


D. H. Francke

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