

TO	J. W. Gressler	FIELD POINT OR DEPT. & BLDG. NO. ALGC	DATE YOUR LETTER
FROM	R. C. Lockemer	FIELD POINT OR DEPT. & BLDG. NO. ALGC - Environmental Affairs	DATE THIS LETTER 11-17-82
SUBJECT			

OSHA Progress Report - October, 1982

1. Summaries of personnel and area monitoring conducted during the month are presented in the attached tables.
2. Three employees from Estane B/433 were treated in the dispensary for irritation of the eyes, ears and nose from bagging K-739 powder produced at ALTC. All three employees were wearing toxic dust masks, shower caps and mono-goggles when the exposure occurred.

The K-739 was originally brought back from ALTC in Fiberpak drums and dumped into eight Tote bins at the B/437 loading dock. Latex employees dumping the material wore nuisance dust masks and did not experience adverse effects. Dusting during the operation was minimal.

The tote bins were then brought into B/433, inverted and emptied into a bagger. The K-739 is very fine and, instead of flowing freely out of the bin, "burped" out creating a dust problem. It appears that the severe dust problem combined with the hygroscopic nature of K-739 caused the employees' symptoms.

The operation was shut down by the foreman when the exposure problem surfaced. The tote bins have now been transferred to ALTC. A Board of Review was held to identify the problems and establish requirements to prevent future occurrences. A report is forthcoming.

3. Employee exposure to copper oxalate during PVC compounding was measured. Both the weighman and the Banbury operator in B/438 received exposures below detectable limits.
4. Long term area monitoring for MDI was conducted on Estane Line 4 during normal operation. Samples taken at the mixer, Berringer and pelletizer were below detectable limits (< 5 ppb). Since the sampling pumps were stationary and represent maximum exposure levels near the line during normal operation, operator exposure should be well below the allowable of 20 ppb based on an 8 hr. TWA.

DISTRIBUTION:

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5. Short-term area monitoring for MDI was conducted on Estane Line 3 during a shutdown. The sampling pump was located in the area of maximum exposure near where the MDI heat exchangers are "blown-out" with nitrogen. The monitoring result was below detectable limits.
6. Attached are two corrected pages for the September, 1982, OSHA Progress Report. Please replace the original pages for September with these pages.

Robert C. Lockemer

RCL/bp

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SUMMARY OF
PERSONNEL MONITORING

Oct. , 1982

Parameter	Allowable Conc. 8 hr. TWA	Month			Year-To-Date		
		No. of Samples	Avg. Conc.	No. Above Allowable	No. of Samples	Avg. Conc.	No. Above Allowable
VCM*	1 ppm						
Plant		35	.75	5	272	2.41	81
B/432							
B/438							
B/449					1	.02	
B/451		2	.23		9	.59	2
B/452		9	.18		23	.15	
B/454		2	.13		3	.15	
B/455		3	.08		17	.15	
B/457					7	.36	
B/458					4	.21	
B/459		2	.18		6	.70	2
B/461		9	2.12	4	121	4.57	60
B/462					1	.02	
B/463		2	.24		5	.15	
B/464		6	.61	1	51	1.58	17
B/465					1	.29	
B/466					22	.09	
B/468							
/471					1	.17	

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* Includes all long term monitoring with and without tasks.

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SUMMARY OF
PERSONNEL MONITORING

Oct. _____, 1982

Parameter	Allowable Conc. 8 hr. TWA	Month			Year-To-Date		
		No. of Samples	Avg. Conc.	No. Above Allowable	No. of Samples	Avg. Conc.	No. Above Allowable
Dust							
Total	10 mg/m ³						
Respirable	5 mg/m ³						
Noise 30/5	85 dBA				107	48.66% 85 db	1
Metals							
Sb	500 µg/m ³						
Cd	200 µg/m ³						
Cr	500 µg/m ³						
Pb	50 µg/m ³				12	66.38	4
Asb.	2 Fiber/gc				6	.22	
Silica	.14 mg/m ³				1	.08	
Organotin	100 µg/m ³				2	5.6	
Selenium	200 µg/m ³				2	4.0	
Benzene	1 ppm				1	0.1	

Area Personnel Monitoring	VCI % Actual < 1			
	Month (No.) %		Year-to-Date (No.) %	
B/451	2	100%	9	78%
B/461	9	56%	121	50%
B/463	2	100%	5	100%
B/464	6	83%	51	67%

(Breakthru Frequency = 4
(Tandem Samples = 35
(%B T month = 11% > 20%

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> 1 PPM LONG TERM TEST

NAME	DATE OF TEST	PPM	RESP.	JOB CODE	EMPLOYEES DESCRIPTION OF WORK	AREA
M. Alten	10-4	12.90	Yes	630	Strainers	461
D. Collins	10-21	1.24	Yes	630	Strainers	461
P. Lewis	10-11	1.22	Yes	100	Foreman - Manhead leak	461
R. R. Woodings	10-11	2.03	No	750	HRC's	461
J. Kemer	10-18	2.74	No	100	Leak detection outside of building	464
<u>AREA TESTING</u>						
Copper Oxlate	9-29	< 1.5 ₃ µg/m	4	900	Weigh 10 batches 70211 White 120	438
		< 1.6 ₃ µg/m	4	650	Banbury Opr. 70211 White 120	438
MDI		<u>PPB</u>				
	9-17	< 4.88	- -	- -	Mixer Line 4	477
		< 5.11	- -	- -	Berringer Line 4	
		< 5.05	- -	- -	Pelletizer Line 4	
MDI	10-18	<u>PPB</u> < 7.33	- -	- -	Shutdown #3 Line Blowing out the lines	433

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GC / < 1 ppm

JAN FEB MAR APR MAY JUNE JULY AUG SEPT OCT NOV DEC

100

50 06 163

0

100

50 06 164

0

100

50 06 165

0

100

50 06 166

0

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SUMMARY OF
PERSONNEL MONITORING

September, 1982

Parameter	Allowable	Month			Year-To-Date		
	Conc. 8 hr. TWA	No. of Samples	Avg. Conc.	No. Above Allowable	No. of Samples	Avg. Conc.	No. Above Allowable
Dust							
Total	10 mg/m ³						
Respirable	5 mg/m ³						
Noise	85 dBA				107	48.66 85 db	1
Metals							
Sb	500 µg/m ³						
Cd	200 µg/m ³						
Cr	500 µg/m ³						
Pb	50 µg/m ³	1	219.5	1	12	66.38	4
Asb	2 Fiber/cc				6	.22	
Silica	.14 mg/m ³				1	.08	
Organotin	100 mg/m ³				2	5.6	
Selenium	200 µg/m ³				2	4.0	
Benzene	1 ppm	1	0.1		1	0.1	

Area Personnel Monitoring	VCl % Actual < 1	
	Month (No.)	Year-to-Date (No.)
B/451	1 100	7 71
B/461	11 64	112 50
B/463	-- --	3 100
B/464	1 100	45 64

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September

> 1 PPM LONG TERM TEST

NAME	DATE OF TEST	PPM	RESP.	JOB CODE	EMPLOYEES DESCRIPTION OF WORK	AREA
G. Mucha	9-16	266.00	yes	750	Poly entry - found leak in bottom valve. Came back out - repaired Aired out poly before reentry	461
K. Wahl	9-24	5.86	no	600	Charge operator	461
D. Collins	9-24	2.12	no	630	B.D.'s recovery	461
P. Lewis	9-14	1.32	no	100	Foreman	461
<u>Building 438 Lead Test</u>						
T. Weigand	9-17	219.5 ₃ µ/m ³	Toxic dust mask	900	Weighing 70 batches Mat. 87302 Blk. 295 Weighing involved 4 hrs. of the 6 hr. test.	438

TO B. Welch/R. Lockemer	FIELD POINT OR AKRON DEPARTMENT & BLDG. NO. Avon Park 300	DATE YOUR LETTER
FROM T. S. Bialke	FIELD POINT OR AKRON DEPARTMENT & BLDG. NO. Akron - D/0020, 5-H	DATE THIS LETTER 1-28-83
SUBJECT		

Respirator Usage during VCM Railcar Line Disconnecting

I do not agree with your recommendation contained in your 1/14/83 letter (attached) for making the usage of the airline respirator optional while disconnecting lines from VCM railcars.

Suitable respiratory protection is needed when disconnecting VCM railcars because there is a potential for exposing an employee to very high concentrations of VCM if one of any number of things go wrong. Your monitoring shows that under normal conditions, if everything goes according to procedure, the probability of an employee being exposed to VCM above 10 ppm is remote. However, if something should go wrong, the magnitude of the resulting exposure could be overwhelming. If it can be guaranteed that under no circumstances will more than a few milligrams of VCM be released if something goes wrong during a railcar unloading, I would agree that respirators are not needed. But we are in the field of accident and illness prevention and there is a possibility (however remote) that thousands of pounds of VCM could be released in a short period of time. In such a situation, the area G.C. would not alert an employee soon enough that he needs to put on a respirator; conceivably an employee already in a respirator may be the only thing between the A.L.G.C. plant and disaster.

The "tripping" hazard can be eliminated by requiring the tank farm employees wear a Scott air pack. If the Scott is too cumbersome, other SCBA's are available. Bio-Marine makes a light weight, highly mobile unit.

T. S. Bialke
T. S. Bialke

v

cc: *✓* ~~E. B. Katzenmeyer, Jr. / H. W. Dietz, M.D.~~ */file*
H. Waltemate/T. Montalbano
J. Gressler

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...in pursuit of excellence

R.C. Lockemer

Avon Lake G.C.

E.B. Katzenmeyer, Jr.

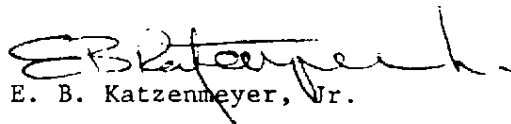
Akron - D/0020, 5-H

9-21-83

August Progress Report

I noted that you experienced 32% breakthru on vinyl chloride samples during August. This seems high and suggests continuation of this problem. Would appreciate your thoughts on this matter and a chance to review your data.

Have you implemented the lower detection limit concept yet and are connections on sampling tubes tight?


E. B. Katzenmeyer, Jr.

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