



ESCAMBIA PLANT
INTEROFFICE MEMORANDUM

To: Howard Watson

Date: 12 March 1975

From: Dale H. Francke

Copies:

J. T. Barr

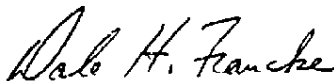
R. E. Jones

E. A. Primeau

Re: Visitor Information Sheet
for PVC Plant Admittance

Attached is a copy of the proposed information sheet which will be given to visitors at the Escambia PVC Plant. Plans are to include this sheet in our unit operating procedure, which is being typed.

Please comment on the attached form. If it is not satisfactory, please supply me with an acceptable form which we can use for our procedures manual.


Dale H. Francke

/ms
Attachment

RECEIVED
MAR 13 1975
R. E. JONES

AP00034549

NOTICE TO ALL VISITORS

You are entering an area that may contain vinyl chloride (VCl). It is a sweet smelling gas that will deaden your sense of smell after breathing it a few times. If you smell this, immediately leave the area, since continued breathing of the fumes will cause unconsciousness.

You have been issued an air mask which will be required in the event area levels of VCl become higher than the OSHA permissible level. All operations and procedures are designed to stay below these levels, but in the event the alarm system does indicate a high level you will be required to use the air mask or leave the area immediately. Follow the procedure below in using the air mask:

HOW TO USE THE AIR MASK:

Putting on the Facepiece:

1. Attach filter body to belt using belt clip.
2. Make sure all head straps are fully extended.
3. Using both hands - Grasp together one temple strap and one cheek strap in each hand.
4. Place the chin into position in the facepiece. (See Figure 1.)
5. Draw the head straps over the head, be sure they all lay flat against the head.
6. Simultaneously draw up and back - both CHEEK (bottom) straps. (See Figure 2.)
7. Simultaneously draw-up and back - both TEMPLE (middle) straps.
8. Place palm of either hand on the junction point where the straps join, push DOWN toward the back of the neck. This exerts a pull on the TOP strap or straps lifting the facepiece into proper position.
9. Repeat steps 6 and 7, taking up any slack or looseness.
10. Adjust TOP strap or straps ONLY if necessary to securely hold the facepiece comfortably and safely in position.

OSHA regulations require that you be instructed that Vinyl Chloride is a cancer-suspect agent.

March 12, 1975

AP00034550



Air Products and Chemicals
INC.

ESCAMBIA PLANT

INTEROFFICE MEMORANDUM

→ To: R. E. Jones

Date: 19 March 1975

From: D. H. Francke

Copies:

J. T. Barr

Re: PVC Programs Related
to VCl Exposure
Weekly Report

M. J. Jones
R. E. JONES

1. Work on completing the PVC Operating Procedures ~~is~~ continuing. The manual should be ready for printing within the next two weeks.
2. Installation of the Data Processing Unit is continuing. Initial results are being received. Some small changes are being made to make the system completely operational by 1 April 1975.
3. The CEA for the new chemical cleaning system is being reviewed before completion and issuance.
4. The CEA for the OSHA related projects was approved and work is progressing toward installation of the projects.
5. Stripping conditions of 180° F for 30 minutes have been successful in maintaining residual VCl levels below 100 ppm in PVC 1230. A procedure of delayed temperature increase during stripping was started on PVC 1230 just prior to switching to PVC 1225. Initial results looked good and the procedure will continue when PVC 1230 is made again.

D. H. Francke

D. H. Francke

/ms

AP00034551

CMR 3/10/75

SPI Petitions for Stay Of VCM Rules Denied

The US Circuit Court of Appeals for the second district in New York has denied a petition by Society of the Plastics Industry and others for a stay of the vinyl chloride standards scheduled to go into effect April 1.

The SPI petition had asked that the Occupational Safety & Health Administration's VCM standards be delayed pending a decision by the Supreme Court as to whether or not it would hear an appeal.

The order was signed by Tom Clark, former Justice of the Supreme Court; Frederick Van Pelt Bryan, retired judge, and Justice Kevin T. Duffy, Southern District of New York—all of whom were "sitting by designation" in the case.

The April 1 date for implementation of the standards was set by the judges at the end of December when they denied a petition of SPI and others for a judicial review of the VCM standards.

Observers believe it's possible the industry group may now approach one of the Supreme Court justices with a request for a stay while waiting to see if the high court will hear the appeal.

RECEIVED

MAR 13 1975

R. E. JONES

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Al Jones

VCM Work Standard Appealed to High Court

Society of the Plastics Industry will petition the US Supreme Court to review the recent US Court of Appeals decision upholding the Occupational Safety & Health Administration standard on vinyl chloride monomer (CMR, 2/10/75, pg. 3).

SPI began the appeal process last week by filing a motion asking the US Court of Appeals for the Second Circuit to stay its ruling of January 31. This decision upheld the OSHA standard but gave sixty days (until April 1, 1975) for compliance.

The motion for a stay would set aside this ruling pending application to the Supreme Court for a writ of certiorari. Continuance of the temporary OSHA standard, which currently limits worker exposure to fifty parts per million of VCM, is also sought pending final case disposition by the Supreme Court. The emergency temporary standard has been in effect during the earlier litigation.

Petitioners have stated that the application for a writ of certiorari will be filed within twenty days and that they will make "every effort to expedite" the new proceedings before the Supreme Court.

Certiorari will be sought on the grounds that the Court of Appeals for the Second Circuit erred in its interpretation of the "substantial evidence" rule to uphold the permanent vinyl chloride standard which OSHA promulgated October 4, 1974, and which established an exposure level of 1 ppm per million.

Further argued that, contrary to enabling legislation, "the standard imposed on the VCM-PVC industry to a technically and economically infeasible regulatory code."

According to SPI, even OSHA Administrator John Stender has conceded the infeasibility of the standard and based the reduction of the 1-ppm exposure level on "expert judgement," rather than factual basis.

L. Harding, Jr., president of SPI, says the VCM-PVC industry is making "every effort" to reduce worker exposure levels and that this work will continue regardless of the petition to the Supreme Court.

Harding says, the decision to ask the Supreme Court for a writ of certiorari is based on the fact that the appellate court ruling would have required the VCM-PVC industry to develop "infeasible engineering controls and work practices in an attempt to achieve unknowable practicable exposure levels."

Because OSHA's variance procedures are also deemed by the industry as "inappropriate" to rectify the problems which would be encountered in attempting to comply with the standard, Mr. Harding says the industry "believes" the Supreme Court should resolve the final status of the standard.

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W. Jones

PLASTIC MATERIALS

PVC- As PVC makers prepare to carry their anti-OSHA case to the Supreme Court (see news story, pg. 3), some industry sources are saying that, next to the capital expenditures involved in making manufacturing operations safe, their biggest worry is a deterioration in resin quality due to toxicity-related process changes.

Says one marketer for a large producer: "I'm more concerned about losing some end-uses because of deteriorating quality than anything else. Some applications may be processed out of the market."

The process changes involved are those related to reducing amounts of residual VCM in finished resin. There is heavy pressure from fabricators that such residue be eliminated so that they will be spared the expense of protecting employees from VCM exposure.

A source at another major producer says: "We might all just have to accept lower quality resin than we've been accustomed to for the last five years or so." The reason, he says, is that reduction of VCM residue requires the application of more heat during drying processes. "When too much heat is applied, ultimate heat stability is affected," he says. "I don't see how that deterioration can be avoided."

However, a spokesman for Goodrich, the largest PVC producer, said that company is "making progress in eliminating residual VCM" and added that "we foresee no diminution of resin quality."

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