



INTER-OFFICE CORRESPONDENCE

Date: October 16, 1974

From: J. A. Clapperton

Location: 19 East

Subject: Revised VCM Work Practice
Guideline

To: Messrs. D. B. Dailey/A. C. Ellsworth
A. G. DeMarco/K. W. Richardson
I. C. Klimas/L. W. Piester
G. J. Lambillotte/J. W. Moore
A. T. Raetzsch/T. G. Taylor

Attached for your review and comment is the revised Vinyl Chloride Work Practice Guideline. The changes made reflect those in the permanent standard published in the Federal Register of October 4, 1974. This Guideline does not incorporate the exact language but rather the intent of the OSHA standard. Also attached to assist you is a listing of the changes made since the original Guideline was prepared on July 25, 1974.

Please have the appropriate people review the Guideline and prepare comments to be returned to me no later than October 28, 1974.


J. A. Clapperton

*I assume
Tommy has
responded to this
by now -*

/mal

Attachment

cc: W. R. Harris
H. C. Twiehaus/F. C. Dehn/Z. G. Bell
R. E. Widing
G. M. Zapp
L. B. Grant, M.D.
W. B. Graybill/L. F. Sargent
J. F. Knott



INTER-OFFICE CORRESPONDENCE

To: Messrs. R. E. Widing
J. A. Clapperton

Date: October 10, 1974
From: Zeb G. Bell, Jr.
Location: 19 East
Subject: Revision of VCM Work
Practice Guideline

As you know, OSHA published its permanent standard on VCM in the October 4, 1974, Federal Register. As a result of that standard, I have revised our Work Practice Guideline for VCM dated July 25, 1974, which was submitted to the plants on July 26, 1974, for implementation. The plants should promptly review this revision and submit their comments to Mr. Clapperton and myself. The changes are not major and this Guideline is prepared to meet the intent of the OSHA standard and not the exact wording.

To assist in the plants' review, the following changes, additions or deletions have been made in our July 25, 1974, VCM Guideline.

III. Definitions

a) "Regulated area" means an area where vinyl chloride concentrations are in excess of the permissible exposure limit. (Revised)

h) "Hazardous operation" is an operation, procedure or activity where ~~vinyl~~ chloride liquid or gas might be expected as a consequence of the operation or because of an accident in the operation which would result in an employee exposure in excess of the permissible exposure limit. (Added)

IV. Environmental (Workplace Air)

a) Concentrations

The following levels of exposure shall be met and shall be effective:
(Revised)

Table I

Limits of Exposure
for VCM in Monomer Plants

<u>Effective Date</u>	<u>TWA, ppm</u>	<u>Ceiling, ppm*</u>
Immediately	10	25
January 1, 1975	1	5 (Revised)

*determined by 15 minute sample (Revised)

V. Medical

- c) The following recommendations are directed primarily at medical screening to detect liver, spleen or kidney disease and/or dysfunction of these organs. They should be considered in the context of . . . (Revised)
- d) 1) At time of initial employment, or . . . to detecting enlargement of liver, spleen or kidneys by abdominal palpation. Abnormalities in skin suggestive of potential tumors, connective tissue and pulmonary systems should be noted. (Revised)
- d) 2) Complete medical checklists shall be reviewed by a licensed physician and should be . . . (Revised)
- d) 3) Additional tests . . . 1967, or under the supervision of a licensed physician. (Revised)
- d) 8) A statement of each employee's suitability for continued exposure to vinyl chloride, including use of protective equipment and respirators, shall be obtained from the examining physician promptly after any examination. A copy of the physician's statement shall be provided each employee and his supervisor. (Added)
- g) These medical records shall be maintained for the duration of the worker's employment plus twenty (20) years or for thirty (30) years, whichever is longer. (Revised)

VI. Labeling and Posting

- a) 2) Areas where hazardous operations are performed or where an emergency currently exists shall be posted with legible signs bearing the following:

**CANCER-SUSPECT AGENT IN THIS AREA
PROTECTIVE EQUIPMENT REQUIRED
AUTHORIZED PERSONNEL ONLY** (Added)

VII. Personal Protective Equipment and Clothing

- a) 3) Vessel Cleaning, Draining, Charging or Maintenance
[Insert 25 ppm where 50 ppm appears.]
- a) 4) E. Employees who monitor the workplace air shall have available appropriate respiratory protection in the event of leaks in equipment. These employees shall wear the respiratory protection when levels being measured exceed the permissible limit. (Added)

VII. b) Clothing

2) For vessel cleaning, maintenance and changing charges, protective clothing shall be worn to prevent skin contact with liquid vinyl chloride monomer or other materials containing vinyl chloride monomer. (Revised)

IX. Work Practices

f) 2) [Insert 25 ppm where 50 ppm appears.]

XI. Monitoring and Record-Keeping Requirements

a) 1) [Change twenty (20) years to thirty (30) years.] (Revised)

a) 2) B. [" " " " "]

b) 1) [" " " " "]

b) 3) Within ten (10) working days following monitoring that discloses that any employee has been exposed, each such employee shall be notified in writing of the results of the exposure measurement. An evaluation of the incident shall be made and corrective action outlined. (Added)

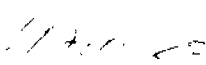
XII. Disciplinary Action

A formal disciplinary action procedure shall be a part of the employee orientation on vinyl chloride monomer and periodically instructed thereafter. (Revised)

Our Work Practice Guideline does not incorporate the exact wording of the permanent OSHA standard for VCM. From the Industrial Hygiene standpoint, we have built in the general intent of the standard without the specific language.

As an industrial hygienist, I have rejected certain requirements. For example: I have deleted the phrase, "without regard to the use of respirators in excess of the permissible exposure limit," since this is not germane. It appears that this phrase has been placed in the standard to pressure industry to make engineering changes to attain the permissible limit. However, this requirement could be applied to maintenance work and tank car loading where engineering changes have been incorporated, etc.

In my opinion, our Work Practice Guideline properly addresses itself to the protection of the workers' health and is both responsible and progressive.


Zeb G. Bell, Jr.

ZGB:mal