



Interoffice Communication

To J. A. De Bernardi
From P. L. Fetzer
Date December 18, 1979
Subject Deregulation of Area No. 5 - EDC Tank Tops

The data developed by Jay Zimmer during the summer indicated that all tanks except T-453 could be deregulated based on the 8-hour test data. However, since employee exposure occurred within a 15-minute time period, the exposure data for this time period was developed. The earlier data summarized below showed that all tank tops except T-453 and T-402 were below the 5.0 ppm VCM 15-minute maximum exposure value.

	<u>T-402</u>	<u>T-405</u>	<u>T-460</u>	<u>T-450</u>	<u>T-451</u>	<u>T-452</u>	<u>T-453</u>
ppm VCM	5.39	1.20	2.81	0.28	4.14	3.99	22.8

Tanks T-402 and T-453 were retested following mechanical check-out and completion of any required maintenance work. Six 15-minute testings of each tank were completed. The average value of the composite testings is 1.2 ppm and 0.52 ppm respectively for tanks T-402 and T-453.

Personnel exposure data for the Pumper-Loaders Offsites whose duties require them to be atop of the EDC tanks are tabulated below. The high values are not attributed to helping the pumper-loader on the loading rack. Two exposures occurred on the shift where the pumper-loaders are atop the EDC tanks but one was attributed to general high area levels and the second to loading a light ends tank car.

ppm VCM					
<u>0.0-0.5</u>	<u>0.5-1.0</u>	<u>1.0-2.0</u>	<u>2.0-3.0</u>	<u>3.0-4.0</u>	<u>4.0-5.0</u>
21	2	1	0	0	2

The original basis for the regulated area was due to the vinyl in the vent gas being omitted atop each tank. Now all EDC tanks are vented into a vent system that is connected to the incinerator reducing exposure atop the EDC tanks. Those maintenance problems which were corrected atop T-453 directly led to the reduction of the recent 15-minute test data.

Based on the recent test data, the EDC tanks T-402 and T-453 should be deregulated. All other tanks should be deregulated on the basis of the earlier data.

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