

Monsanto

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R. W. Flint, Texas City

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EVC Vinyl Chloride Testing

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This memo will summarize what we have concluded with respect to VCM testing in EVC and our position on each point of the NIOSH recommendations attached as "Enclosure 1." Also attached as "Enclosure 2" is the text of what we reviewed with all operators and assigned maintenance personnel in EVC.

The numbering on the following is the same as the NIOSH recommendations included as "Enclosure 1."

I. General Housekeeping Procedures

- A. 1. VC is a gas under ambient conditions. No evidence of spills are in the area.
- 2. Not applicable to EVC.
- 3. Not applicable to EVC.
- B. Inventory of VC receipts and consumption are part of normal accounting procedures.
- C. Not applicable to EVC.
- D. No VC was detected by sampling with infra-red analyzer in control house facilities which are separate from the polymerization structure.

II. Protective Clothing

- A. Emergency clothing is available in the control room. We do not plan on routine change of clothing since exposures are minimal.
- B. Not applicable to EVC.
- C. Hard hats are mandatory in the operating area.

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- D. We plan to use slicker suits whenever the polymerization reactors are entered.

III. Showers

Based on current exposure data, we do not plan to require showers at the termination of eight-hour shift.

IV. Monitoring

- A. 1. We plan to implement this procedure effective now. Environmental monitoring is described in "Enclosure 2." Clothing requirements for entering reactors were mentioned in Item II-D.

- 2. Monitoring program is in progress.

- 3. We are in progress of modifying VC unloading procedures based on results of environmental testing.

- 4. Measurement of VC concentration in various areas of the department are part of the current testing program.

- 5. Not applicable for EVC.

B. Personal Monitoring

- 1. We plan to implement as part of our testing program listed in "Enclosure 2." We are currently obtaining materials and setting up procedures to evaluate the personal monitoring samples.

- 2. Breathing zone samples will be used as the basic technique for personal monitoring.

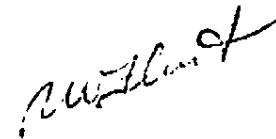
V. Respiratory Protection

- A. Should VC be detected inside the polymerization reactors, personnel entering reactors will be equipped with fresh air masks.

- B. Not applicable for EVC.

- C. We do not plan to do this. We feel our current procedures are adequate to avoid significant exposure. This would create severe problems in other hazardous areas of the plant.
- D. This is included as part of our exposure testing program.

John Fox will publish a report periodically summarizing the quantitative sampling program. We will supply you copies of these reports as they are issued. If you have questions, please do not hesitate to call me.



R. W. Flint

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Encl.