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ATT HPG



INTER-OFFICE CORRESPONDENCE

To: F. C. Dehn

Date: July 9, 1979

From: Z. G. Bell

Location: 5 West

Subject: EDC Health
Performance
Guideline

The latest draft dated July, 1978, is attached. It was developed based on the VDC Health Performance Guideline. It was reviewed with both Lake Charles and Beaumont management. There was a meeting held in General Office with representatives from Caribe, Lake Charles, and Beaumont to review the EDC HPG. Minutes of that meeting are attached.

P. J. Snyder and Z. G. Bell visited the plant in June, 1977, and Beaumont said before they could implement the guideline they would have to perform an impact analysis. This was conveyed to I. C. Klimas, and to date, Beaumont has not submitted any data on the impact of the proposed HPG.

Zeb G. Bell, Jr.

/ta

Attachment

cc: C. H. Powell
P. J. Snyder

SL 088180

March 28, 1979

Review of the Ethylene Dichloride Workpractice

Conference Room 3

Present: Z. G. Bell (G.O.) R. Miller
R. G. Corley (Beaumont) W. J. Peard (Lake Charles)
K. Ezzelle (Caribe) P. J. Snyder (G.O.)
L. B. Grant (G.O.) R. E. Sourwine (G.O.)

Reviewed Background History and Toxicological Research

- Information released to customers
- NIOSH Criteria Document
- Need for workpractice guidelines
- Anticipated rulemaking under OSHA's standards completion project

Approach to Responding to Toxicological Findings

- Environmental Affairs role in anticipating problems, regulations, interpreting data, evaluating its significance, and setting internal standards to (1) act responsible, (2) minimize the impact of regulations, and (3) protect the health of the worker.
- Internal standards set via computer program and by workpractice guidelines, e.g., EDC, VDC.

Recognition of Plant Managers Needs

- Need to have, expect operation personnel to plan ahead, anticipate future costs, manpower.
- Plant management need to know that costs of meeting guidelines are acknowledged by division management.
- Operation personnel need to understand that guidelines are important, supported by upper management and necessary.
- There is a feeling that division level management wants plant operations to (1) stay within the budget, and (2) implement guidelines.

Scope and Application (PPG and Contractors)

- Medical: 1. Lake Charles to restrict all of plant B. Up to now, contractors covered only by (for) VCM. Now required under VDC and EDC.

2. Caribe "casual employees" not covered, other contractors in VCM (and therefore EDC) are provided medical surveillance.

3. Beaumont has a unique problem here as this is the first workpractice implemented. Caribe and Lake Charles had the VCM rule-making to contend with.

Could require (1) no contractors or (2) have contractors themselves accept the responsibility for providing medical surveillance. Providing medical surveillance to contractors by PPG at Beaumont appears to be too costly and impossible to administer.

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The need to medically authorize personnel is not in question. Such preplacement exams could eliminate (or reduce) the possibility of a successful third-party suit at a later date.

Problem does exist with implementing such a program at this time.

Beaumont and other facilities need to have the ability to carry out special placement. Beaumont can remove employees from lead exposure only because of "rate retention." No permanent restrictions have been made because of lead, however, and so the system has never been tested. May walk out.

- Need to establish:
1. Legally can PPG transfer medical responsibility to contractor.
 2. Is PPG to wait for a government regulation before addressing all workers (VCM standard)? It appears a unilateral change in plant-union contracts would be needed at Beaumont.
 3. What is the "legal definition" of a casual visitor?
This approach has been taken at Caribe.

At the present time the EDC Guideline is to omit contract workers totally.

- Other:
1. Personnel monitoring section to be modified to handle maintenance personnel.
 2. Medical section needs revision to "accommodate" Corporate input.
 3. Personnel monitoring section to be modified to incorporate recent approach taken on Benzene Workpractice.