

ORGANIZATION CORRESPONDENCE
THE GENERAL TIRE & RUBBER COMPANY
CHEMICAL DIVISION

TO M. G. Glenn
ATTENTION R. W. Laundrie

FROM H. E. Jewett
DATE March 18, 1976
SUBJECT VCSA Meeting
February 28
Atlanta, Ga.

cc: M. C. Bentley
R. L. Jackson
E. S. Kierstead

NOTES FROM VCSA IN ATLANTA

The main format of the meeting was a statement by each company where they stood on OSHA with regards to work levels VCM, RVCM in resin, medical surveillance, monitoring equipment and procedures, productivity loss, OSHA.

Rather than list in detail each FVC producer, a summary of what is being done will be presented. I have a complete table by producer if you want any specifics.

Summary

Per cents are rounded to nearest 10 because voting was not always accurate.

1. Monitoring systems -- % by type of those commenting:

Bendix	10 units
Arcas	10 units
Honeywell	1 unit
Miran	5 units
Self	(Union Carbide and Pantasote)

Only two of 23 companies have a single system as General Tire does. Some plants have three or four systems. Based on VCSA group discussions, we should consider ordering a second Arcas, using some of the points for EPA monitoring. Eight plants have computer data tabulation on readings.

2. VCM Levels

Area	Average Level		
	0 - 1	1 - 3	3 - 8
Polymer	10%	40%	50%
Resin Finishing	30	60	10
Warehouse	60	40	0
Tank Farm	50	50	0

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Mechanics tend to be a problem on personnel exposure. Several high exposures. All plants reported excursions over 100 occur periodically.

3. RVCM in Resins

See separate memo issued to M. G. Glenn.

4. Medical Surveillance

General Tire program is equal to best, and better than most programs for medical surveillance. Goodyear and General Tire are the only two companies to use the advanced blood work SMA-22. All the rest are using SMA-12. We are providing an equivalent medical program for much less per employee than the majority of those commenting.

On refusal to take medical work, most are obtaining an affidavit that the testing was offered but refused.

Vast majority are not furnishing medical surveillance for outside contractors but are presenting training on VCM to long term contractors in plant.

5. Leak Patrol

The majority of the EPA discussion centered around the leak patrol criteria in the Standard. All companies agreed that leak patrol was a necessary and useful tool, but there was no unanimity on the frequency and details of this patrol. Goodyear is the only plant with 24 hours a day, 7 day a week leak patrol coverage.

Most plants agreed that there was a need for at least a minimum of 8 hours leak patrol per week day and some spot checks on the weekend. One plant started a program of numbering all valves and flanges, pump seals, etc., but when they hit 900 and some numbered parts, they abandoned the program.

It was a general consensus that a leak patrol should have area sheets, for example, a sheet for each reactor, a sheet for the recovery area, a sheet for the MVC transfer pumps, etc. Some plants indicated a need to put a very small bird cage around the probe of the Century to prevent over-zealous leak patrol people from sticking it, for example, down in a valve stem cavity. They will always get a high reading doing this.

There was an agreement that 25 ppm detected by the permanent monitoring system on two consecutive readings indicated a leak and would require a leak patrol to investigate and correct.

There was a general agreement that the EPA would allow the collection of high RVCM waters and put them to a central system for stripping.

6. True Confessions

The only item covered under true confessions was an incident involving mischarging of catalyst into the reactor due to a communication breakdown between two operators. The catalyst was charged into a hot reactor causing auto ignition and flames from the reactor. The main breakdown in the procedure was the failure to follow a required check list for charging reactors.

7. General Comments

- a. Most companies are sending only one representative to future meetings.
- b. Most companies are going to video slide presentation for presenting the OSHA Standard.
- c. Most companies are alarming at +5 and +25. We are alarming at +1, +5, and +1000.
- d. Most people with Mirans find they do not work adequately.

8. Conclusions

It is my firm opinion that we should not approach the EPA Standard with the same crash type programs as we did OSHA. I firmly believe we should request variances in all areas and do an organized detailed completion of each project. This would prevent many of the fiascos that we encountered in the OSHA program, such as using the wrong piping for our plant breathing air system.

May I have your thoughts on this approach.

H. E. Jewett

H. E. Jewett
Plant Manager

HEJ:sm