



TO G. C. Strickler

DATE February 8, 1984

FROM R. H. Williams

SUBJECT VCM Occupational Health Audit

Steve Illes' April, 1983 VCM Occupational Health Audit sent to you by T. E. Baldaulf has been reviewed with the appropriate parties. The following responses are provided to satisfy the concerns expressed in the audit. While not all items are completely resolved, steps taken to effect a solution are detailed herein. Unless requested otherwise, a progress report addressing currently unresolved items will be provided to you not later than April 30, 1984.

Items requiring a response from Lake Charles are listed under Subheading III in Mr. Illes' report.

<u>Item</u>	<u>Response</u>
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III.A.	<u>Overstandard Results and Written Compliance Plans</u> - Since the time of the VCM Occupational Health Audit, three of fourteen personnel samples collected during VCM tank car operations have produced overstandard results. The following actions have or will be taken to reduce the probability of VCM overexposure during tank car loading operations:
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1. A review of the existing procedure will be completed to ensure feasible engineering and work practice controls are employed.
2. Supervision will review the existing procedure and any revisions, as necessary, with affected employees to assure compliance with its provisions.
3. Air supplied respiratory will be used during connecting/disconnecting transfer hoses and other high potential exposure operations as specified procedurally.
4. A review of VCM tank car level gauges has revealed that spew gauges are no longer in use. All PPG tank cars are equipped with totally enclosed level gauges which have eliminated this as source of employee exposure.

Two personnel samples have been collected since the Audit was completed. A Tanker Man and Tanker Man's Helper were monitored simultaneously during a ship loading operation. Both samples were overstandard, but this was not attributed directly to the task in which these employees were involved. An upset elsewhere on the ship resulted in these employees being inadvertently exposed. Personnel monitoring of marine operations will continue as the opportunity presents itself.

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<u>Item</u>	<u>Response</u>
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| III.B. | <u>Air Monitoring Method</u> - To further validate our methodology, the Laboratory has instituted a program of analyzing individually the front and back section of charcoal tubes used for VCM sampling. We have chosen this method rather than using two sample tubes in series as it is believed this will result in too much pressure drop for the sampling pumps. |
| III.C. | <u>Employee Training</u> - The Safety Training Committee has developed procedures for advising each work group in the plant of OSHA training requirements. VCM related training is included in these procedures. |
| III.D. | <u>Regulated Areas</u> - Meetings were conducted with Plant B Operations personnel to assess our posture visavis Regulated Areas and the VCM Standard. A letter has been sent to the OSHA Area Director updating our listing of Regulated Areas (copy attached). Additionally, a review of signage in existing Regulated Areas has been completed to assure compliance with the Standard. |
| III.E. | <u>Labelling</u> - VCM contaminated wastes transported both within and outside the plant typically contain less than one percent VCM. Monitoring results for employees handling the waste containers have shown no significant exposure (at or above the action level). Waste containers are appropriately labelled and manifested per RCRA, but I see no need visavis the VCM Standard to add another labelling requirement to existing practices. |
| III.F. | <u>Medical Surveillance</u> - Records of maintenance personnel are being searched to identify those individuals with over ten years of VCM exposure for semi-annual physical examinations. |

A request has been made of G.O. medical, safety and environmental health personnel to review the decision that one year of exposure is equivalent to working one day anywhere in Plant B. It is felt that this definition is too conservative.

All other requirements of Item F are satisfied.

shr

cc: J. E. Fike
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