



Interoffice Communication

"CONFIDENTIAL"

To R. E. Lehmkuhl
From J. A. DeBernardi
Date April 4, 1977
Subject 1976 VCM Plant Objectives Review

With reference to your letter of March 11, on the subject I believe some further explanation is necessary in areas which fell short of goals in 1976 than was given in my January 21, letter.

Environmental Control

Of the five non-compliance reports filed with EPA during 1976, four related to system by-passes caused by heavy rainfall. Two of the four by-passes occurred as a direct result of work being done on the rain water containment revisions at the secondary system that will prevent this problem in the future.

Operation Department Overtime

As you are aware, the VCM Plant par organization is set up in a manner that allows for an overtime rate in the operations department in excess of what would be expected in a plant manned along the line of a full "breaker" concept. In addition to this our plant staffing does not allow for extra people on the payroll that can be trained and made ready to fill openings that occur by resignation, or department transfer. These staffing concepts overall are economically justifiable, but do lead to abnormally high overtime rates when movements occur in the shift work classifications. Par additions to our staffing were made in 1974 in an attempt to alleviate some of these problems. However, due to department transfers, resignations and dismissals occurring in 1975 and 1976 we were unable to fill all par positions until late 1976.

A review of our 1976 overtime statistics compared to 1975 indicates that overtime due to sickness was up 110%. However, it should be pointed out that if sickness related to long term illness (operations, etc.) is deducted from the overtime we showed a 25% increase over 1975. This is an area we attacked using employee counseling and for chronic offenders insisting on a doctor's release for any time missed. The second revealing statistics relates to overtime coverage due to department transfer and filling of job vacancies. In 1976 16% of total overtime hours worked were due to these problems. Although I'm sure that better planning on our part could have reduced this figure to some extent, our present staffing and hiring philosophy will mean a significant amount of overtime will be worked in our plant whenever turnover occurs for whatever reason.

CCR 000048428

Regulated Areas

The plant regulated area we were not able to deregulate based on our 1976 plan was the laboratory. Recognized problem area equipment changes were accomplished early in 1976, however, a review of fixed point monitor data and personnel monitor data made after these changes continued to show exposures above acceptable levels during peak VCM handling periods in the lab. Further investigation pointed toward vent hood problems related to duct work, blowers, etc. These problems were corrected and monitoring continued to establish exposure levels over a representative time period. Compilation of the new data was started in January, 1977. These results now indicate that deregulation is possible and will take place in April, 1977.

In order to assure that continued emphasis and attention are being given to accomplishment of our plant objectives the following procedures begun in 1976 will be continued:

- 1) Department Heads will report on their department and plant goal accomplishments on a quarterly basis. After review of these reports a meeting will be held with each Department Head to layout plans for actions to be taken to correct deficiencies in progress toward goals.
- 2) Absenteeism reports and analysis will be prepared by Department Heads on a quarterly basis. Counseling of chronic offenders will continue.



J. A. DeBernardi

br
cc:
RDG