Vista Chemical Company

15990 N. Barker's Landing Rd.
Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

JJH: ~~JGL:~~ ~~TGG:~~ RF
XF: none

October 15, 1984

VISTA

Ms. Margaret Samaways
Gulf Oil Corporation
P.O. Box 1166
Gulf Bldg. - Room 358
Pittsburgh, PA 15230

Dear Margaret:

Enclosed is a copy of my speech (please excuse extraneous markings), a copy of my slide text, and the Marnie comparison summary. Good luck with the chapter.

Sincerely,

Thomas G. Grumbles, C.I.H.
Director, Industrial Hygiene

ajo
004

Enclosures

VVV 000016241

Vista Chemical Company

15990 N. Barker's Landing Rd.
Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

JJH: ~~GCL~~: ~~TGG~~: RF
XF: OSHA -20

October 12, 1984

VISTA

Carol Stack
Chemical Manufacturers Association
2501 M Street, NW
Suite 200
Washington, DC 20037

Dear Carol:

Vista Chemical's comments on the STEL issue are below. We have identified the following operations where potential peak or short-term exposures to Eto may occur during operations at our Ethoxylation Unit.

1. Unloading Eto cars
2. Loading product cars
3. Eto product sampling
4. Eto analytical procedures in the laboratory
5. Maintenance operations including vessel entry
6. Emergencies

Of those operations listed above 1,2, and 6 are specifically cited in the standard as operations for which respirator use is acceptable. For number three we have designed a closed-loop sampling system which controls peak exposures during those operations. For number 4, exposures are controlled by restricting all Eto operations to chemical fume hoods. Where maintenance operations may result in exposures, our procedures require the use of respirators until atmospheric levels of Eto are determined. Exposures during these operations could not be reduced by feasible engineering controls at this time. Respirator use would be required for these jobs.

Based on the information above, we would not see a need to do a significant amount of short-term sampling for compliance with a STEL. However, if required we are not confident that we could monitor within the accuracy limits of the standard. We feel our lower detectable limit is right at 0.5 ppm with a 2-hour sample and a 15-minute sample would result in questionable accuracy. We do not, however, have quantitative data to confirm this. The costs for short-term monitoring would increase directly, due to more samples, and indirectly, due to the additional man-hours needed to collect 15-minute samples versus longer term samples.

In general, we feel the EOIC should reemphasize their comments regarding the lack of scientific evidence regarding the need for a STEL, and the fact that the controls required to meet a 1.0 ppm PEL would control most exposures to below 10 ppm.

Sincerely,

Thomas G. Grumbles, C.I.H.
Director, Industrial Hygiene

ajo