

BF Goodrich

Chemical Division

Inter-Organization Correspondence

To Dr. W. H. W. W. W. Location Cleveland Department	From Chuck McCann Location Pedricktown Department
Subject VCM PERSONNEL MONITORING DATA 1979 - 1981	
Date 1/19/82	

The following is a summary of the personnel monitoring data gathered for Mass Resin.

YEAR	#READINGS	0.0-0.5	0.5-1.0	>1.0	RANGE	ARITH. AVG.	LOG AVG.
1979 Respirator worn	91	52	16	23	.01-21.82	1.39	0.39
No respirator worn	83	81	1	1	.01-4.22	.16	0.08
Total	174	133	17	24		.80	0.18
1980 Respirator worn	34	15	6	13	.00-12.85	1.63	0.34
No respirator worn	119	114	5	0	.00-.87	0.11	0.04
Total	153	125	11	13		0.45	0.06
1981 Respirator worn	45	29	9	9	.01-3.09	0.61	0.27
No respirator worn	107	95	8	4	.00-12.58	0.36	0.09
Total	152	122	17	13		0.43	0.12
1979-1981 Respirator worn	170	94	31	45	.00-21.82	1.23	0.34
No respirator worn	309	290	14	5	.00-12.58	0.21	0.06
Total	479	384	45	50		0.57	0.11

If we can assume that the actual exposure on a shift where a respirator was used was < 1.0 , we can state that actual exposure was less than 1.0ppm 99% of the time:
 (474/479 = 98.96%)

Logarithmic averages are included as they are felt to be more representative of "typical" employee exposure.

If you have need of any more information on this, please let me know.

Thanks,

Chuck McCann
 Chuck McCann
 CEM/re

cc: B.A. Prusinoski/M. Dunn
 J.A. Kiel

NGC 14846

*can deal with but may still require
 monitor 70.5 < 1.0 But still can not employee
 workers*

April 30, 1975

Mr. William Dreeland
Area Director - Region II
U.S. Department of Labor
Occupational Safety & Health Administration
970 Broad Street
Newark, New Jersey 07102

Dear Sir:

In accordance with the requirements of 29 C.F.R. 1910.93q (n) (1) (i) and (ii), the B.F. Goodrich Chemical Company, P.O. Box 400, Pedricktown, New Jersey 08067 is reporting the following information regarding regulated areas at this location.

Plant Location:

U.S. Route 130 and Porcupine Road
Salem County
Pedricktown, New Jersey

Number of Regulated Areas: Two (2)

Building 512 - Mass Resin Polymerization
Building
Building 513 - Suspension and Dispersion Resins
Polymerization Building

Number of employees in each regulated area at any given time during normal operations:

Building 512 - 3 Assigned
1 to 4 on intermittent basis
Building 513 - 5 Assigned
1 to 6 on intermittent basis

Any changes to the above information will be reported within 15 days of the effective date.

Respectfully,

The B.F. Goodrich Company

A. R. Webber
Plant Manager

ARW:DPOK:jle

NGC 14847

March 12, 1981

To: J. M. Fletcher

Re: MASS RESIN VCM MONITORING

I have been requested to review the Mass Resin VCM monitoring results for consideration of deregulating this process.

Dave Winstead in his December 22, 1980 letter to Dr. Dietz included a January, 1978-June, 1980 summary of VCM Personnel Monitoring. This summary is insufficient to make a recommendation.

Please provide me with the individual data by year for the five classifications shown in this summary. Also the data should be for the complete year of 1980 and any new data available in 1981. I will review this information with the appropriate individuals and make a recommendation on deregulating this process.

Please call me if clarification is needed.

H. Waltemate

HW

cc: H. J. Lanese/E. W. Harrington
N. R. Aquino
R. M. Montgomery

NGC 14848

BFGoodrich
Chemical Division
Inter-Organization Correspondence

To D.L. Winstead	From Chuck McCann	MAY 29 1981
Location Pedricktown	Location Pedricktown	
Department Personnel	Department Environmental	
Subject REGULATORY STATUS RECLASSIFICATION FOR MASS RESIN POLYMERIZATION AND ACRYLIC LATEX REACTOR CLEANING		Date 5/15/81

On April 30, 1975, the BFGoodrich Company notified the Occupational Safety and Health Administration (OSHA), that the Mass Resin Polymerization Area, housed in Bldg. 512 at the Pedricktown, N.J. facility, was designated as a regulated area under the OSHA Vinyl Chloride Standard 29CFR1910.1017. The OSHA Vinyl Chloride Standard established a permissible exposure limit of 1.0ppm and an action level of 0.5ppm of vinyl chloride for an 8 hr. time weighted average (TWA).

On December 1, 1978, the BFGoodrich Company notified OSHA that the task of entering and cleaning polymerization vessels in the Pedricktown facility's Acrylic Latex area, housed in Bldg. 502, was a regulated task under the guidelines set forth in the OSHA Standard for Acrylonitrile 29CFR1910.1045. The OSHA Acrylonitrile Standard establishes a permissible exposure limit of 2.0ppm and an action level of 1.0ppm for an 8 hr. TWA.

Based on personnel monitoring information compiled in conformance to these OSHA standards, it is proposed that the Mass Resin area and the function of cleaning Acrylic Latex reactors should be reclassified per their respective OSHA standards.

In support of this proposal, many factors were taken into consideration when questions of time frame and data analysis were encountered. The Mass Resin area, due to process improvements and a continued emphasis in fugitive emissions, has experienced a reduction in the level of Vinyl Chloride monomer in the general workplace atmosphere. The monitoring results from 1980, therefore, are indicative of how the Mass Resin area can be expected to perform. The task of reactor cleaning in the Acrylic Latex area, on the other hand, was essentially the same in 1978 as it is currently, and personnel monitoring results gathered during this period of 1978 thru 1980 are presented to indicate the exposure monitoring history for this position. It should be noted that the automatic reactor cleaning system, being brought on line in the second quarter 1981, is expected to further improve the levels of exposure related to this position as both frequency and extent of manual reactor cleaning may be reduced.

It should be noted that without regard to OSHA classification both Mass Resin and Acrylic Latex have defined tasks where personnel protective equipment is mandatory. These tasks are defined in Pedricktown Safety procedures SA 30B and SA 31C and are incorporated into specific operational or manufacturing procedures as warranted.

NGC 14849

Page 2:

The tables below summarize the data that have been compiled in support of the deregulation of the Mass Resin Bldg. 512 and the task of cleaning reactors in the Acrylic Latex Bldg. 502. If you have any questions, please feel free to contact me.

VINYL CHLORIDE

MASS RESIN PERSONNEL MONITORING DATA - 1980

POSITION	NO. OF SAMPLES	WITHOUT RESPIRATOR				WITH RESPIRATOR			
		NO.	%≤.5	%<1.0	AVG.	NO.	%≤.5	%<1.0	RANGE
Lead Technician	56	46	97.8	100.	0.09	10	30	40	.01-8.46
Technician	52	31	93.5	100.	0.11	21	42.9	66.7	.00-12.8
Utility	20	17	94.1	100.	0.18	3	100.	100.	.15-.33
Professional	20	20	100.	100.	0.06	0	-	-	-
TOTAL	148	114	96.5	100.	.10	34	44.1	61.8	.00-12.8

ACRYLONITRILE

ACRYLIC LATEX PERSONNEL MONITORING RESULTS - 1978-1980

POSITION	NO. OF SAMPLES	WITHOUT RESPIRATOR				WITH RESPIRATOR			
		NO.	%≤1.0	%<2.0	AVG.	NO.	%≤1.0	%<2.0	RANGE
Utility	91	42	97.6	100.0	0.07	49	75.5	83.7	.00-14.1

Chuck McCann
Chuck McCann
CEM/re

cc: ~~H. Waltemate/I. Bralke~~ → *H.W. F. 12*
C.J. Nosal/J.M. Fletcher/J.A. Kiel
B.A. Prusinoski/R.J. Purtell
R.R. Szmerda/D.R. Erbe
D.P. O'Keefe/W.R. Myers
File - VCM Personnel Monitoring
- VCN Personnel Monitoring

NGC 14850