

December 10, 1979

Mr. D. E. Wigfield

Blue Bell #2126

Trip Report - Social Circle #292

H. W. Blakeslee/veh

Blue Bell #2126

cc: Mr. T. Waldrop - Social Circle #292
Mr. T. Dougherty - Blue Bell #2126
Mr. J. Wait - Valley Forge #2B
Mr. R. Kally - Blue Bell #2126
Mr. A. Gellner - Lake Charles #283

I visited the Social Circle PVC pipe plant on November 5 and 6, 1979. The purpose of the visit was to review the plant operation in the light of various environmental considerations. I met with Tom Waldrop, the Plant Manager, who was very cooperative and helpful in obtaining the information necessary for the survey.

Others who provided assistance were Howard Janousek - Plant Engineer, Ron Moss - Safety Director, Bill Harland - Purchasing, and David Smallwood - Shipping and Receiving.

The specific areas which were investigated were waste disposal practices, PCB items, water management and VCM monitoring.

The following is a summary of specific problems identified in the survey. Each is discussed in more detail in the next section.

- o Numerous discarded drums are stored in the back corner of the property. These have created a nuisance and should be cleaned out as soon as possible - definitely before the promulgation of RCRA rules, i.e.: next spring. Disposable drums should be reduced in number whenever possible. One suggestion is to purchase the tin stabilizer in 2800 pound returnable containers.
- o Several one gallon cans of an obsolete ink thinner were found in the tool storage area. The contents were not identified, but they smelled like ether which is highly flammable and possibly explosive. Immediate recommendation was made for disposal of these. The currently used solvents may also be flammable and should be stored accordingly. No materials should be stored without knowledge of their hazarousness.
- o
- o An acetone bath in the Quality Control laboratory was not tightly sealed allowing acetone to evaporate into the air. The test in which acetone is used should be done in a glass desiccator with a tight fitting lid. In addition, the laboratory should be provided with an exhaust fan and a fresh air inlet.

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VCM Monitoring (Continued)

Each sample is taken for a six hour period. The charcoal tube is then broken in half, and the main and backup sections sealed in glass vials and sent to Lake Charles for analysis. The results take two to four weeks.

No samples have been taken in the last few months because fresh tubes have not been sent from Lake Charles. Due to the importance of this program, this delay should be corrected. The normal delay between sampling and analysis makes the monitoring program unusable as a warning for the blend area where occasional high readings are recorded. For this reason a VCM monitor would be useful to sound an immediate warning when respirators are necessary.

The blend area is also obviously dusty and has been tested by Travelers Insurance in the past. This should be done on a regular basis. Corporate Safety and Health could incorporate this into their annual wall-to-wall survey. A noise survey could also be done at the same time.

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December 10, 1979

Mr. D. E. Wigfield Blue Ball #2126

Trip Report - Cameron Park

H. W. Blakeslee/veh Blue Ball #2126

cc: Mr. R. Becker - Cameron Park #294
Mr. W. Krivsky - Valley Forge #2B
Mr. T. Dougherty - Blue Ball #2126
Mr. F. Timpe - Valley Forge #2B
Mr. J. Wait - Valley Forge #2B
Mr. R. Kelly - Blue Ball #2126
Mr. A. Gallner - Lake Charles #283
Mr. R. Feltz - Blue Ball #2126

I visited the Cameron Park FVC plant in the company of Bob Feltz on November 20 and 30, 1979. The purpose of the visit was to review the plant operations in light of various environmental considerations. I met with Ron Becker, the Plant Manager, who was very cooperative and helpful in obtaining the information necessary for this survey.

Others who provided assistance were Chuck Bence - Maintenance Superintendent, Jim Moddison - Quality Control Supervisor, Jim Wisdom - Utilities Supervisor, and Frank Partin - Production Superintendent.

Specific areas which were investigated were waste disposal practices, PCB items, water management and VCM monitoring. The following is a summary of specific problems identified in the survey. Each area is discussed in more detail in the next section.

- o The VCM monitoring program is not being performed often enough. This year, seven samples were taken in February, six in May, and seven in November. Of these there is a noticeable increase in VCM concentration from February to May. This should be investigated, particularly if the November readings turn out to be in the same range as the May readings.
- o Airborne dust may be a problem. It appears as a haze in the extrusion area and is evident as a deposit on most surfaces. This may result from fines produced by the scrap grinder. This equipment should be vented outside and have a rotary valve on the discharge. Corporate Safety and Health will be requested to monitor respirable dust as well as noise on their next annual wall-to-wall survey.

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Water Management (Continued)

The water feeding each cooling tank is filtered through a dual GAF nylon bag filter units. These require changing every one to four days. The return water from the vacuum pump seals is filtered by a Perma Raine unit which continuously expells the sludge into a drain. A very coarse filter is used on the exit of the cooling baths to collect large particulate. A flocculant is added to the system to improve the efficiency of the filters. As a result of this filtration, very little sludge was found in the hot well during the system clean-out this year. The sludge was landfilled along with the routine trash.

The condenser water is treated with flocculant and chlorine supplied by NASA Chemicals. It is bled off to a holding tank on the outside of the building. Sludge from the Perma Raine filter and the floor drain water is also fed to this tank. Overflow from the tank is run to a ditch which runs across the middle of the property.

A meeting was held on Friday, November 30, 1979 with Messrs Eddy and Womack of NASA Chemicals to discuss future treatment of the water system. I requested a quotation for automatic chlorine treatment of the condenser water. Further, I suggested to Chuck Bence that the hot well be modified to act as an oil separator and that no emulsifiers be added to the chill water system. As an experiment, I suggest that the blowdown of the condenser water be added to the chilled water to reduce the discharge of water.

VCM Monitoring

A VCM monitoring program is being run by Al Miguel, the Quality Control lead man. This is a new assignment, and Al has very little training in this area. For the most part, samples are taken in areas rather than on workers. In the November survey, samples were taken in the resin silo, on the resin truck driver, in the tunnel area, in the batch room, in the equipment room, in the general manufacturing area, and in the blender room. The results of these analyses have not been returned from Lake Charles. Historically from two to four weeks have been required for analysis results to be returned.

The previous survey was conducted in May of this year in the same areas. The average of the six readings taken in May was 0.6 ppm. This is considerably higher than the previous set of data taken in February. In particular, the resin truck driver was shown to be exposed to over 1.1 ppm. In the past, this position has shown a 0.0 reading. It is possible, therefore, that the truck driver is momentarily exposed to a high concentration. The most likely place for this to occur is when he opens the hatches on the rail cars.

VCM Monitoring (Continued)

The rail siding was inspected to determine the type of activity which the truck driver performed at this site. As a side note, it was apparent that the rail siding is completely open to trespassing. The hatches on the cars, and doors on the pump building are unsecured. It is conceivable that a child could actually fall into the resin tanks.

I suggest that Lake Charles investigate the head space concentration in the tank cars. This should be done not only after filling but also after several days travel time. If high concentrations are found, the truck driver should be given a respirator to wear during hatch openings procedures. The same type of precautions pertain to the resin silos. If high concentrations occur in these areas, respiratory protection should be made mandatory, or a continuous monitor with an alarm system should be installed on the silos.

A well defined VCM monitoring program is mandatory to insure worker protection against VCM exposure and to provide feedback on ventilation system adequacy. Central Engineering is planning to issue a set of guidelines for all FVC plants to follow. In the meantime, regular bi-monthly monitoring of at least one worker in each sum of the plant is recommended. Samples should be taken on the workers rather than in the working area. Follow-up should be made of all areas with over 0.5 ppm VCM.

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