

MEMORANDUM

To: Mr. J. B. Leverton

November 13, 1975

From: → D. E. Deese

Copies: Mr. D. L. Engle
Mr. R. L. Frantz
Dr. D. H. Glenn
Mr. W. P. Nickles
Mr. R. E. Peele
Mr. K. E. Ross
Mr. R. W. Sesler
Mr. G. F. Tacquard
Mr. R. J. Taylor
Plant OSHA Committee



Subject: OSHA Vinyl Chloride Inspection
November 12, 1975

Dear John:

Below is a summary of the subject inspection. On November 8, 1975 at 1:15 a.m. and again at 7:30 p.m. two separate but similar emergency releases of vinyl chloride monomer occurred as the result of equipment failure. The apparent problem was vibration fatigue of a 1/2-inch nipple on the B-4 Autoclave pump discharge south of Bldg. 115. Varnish spilled to the pad.

In accordance with 29 CFR 1910.1017 (n)(2), R. J. Taylor reported the incident to the OSHA Area Director in Houston late Sunday, November 9, 1975. The writer phoned the Area Office Monday at 3:30 p.m. and talked with Mr. Bruce Larson, Compliance Officer. Receipt of the telegram was acknowledged. He indicated that he and the Area Director would visit the Texas City Plant Tuesday afternoon, November 11. Their inspection would be limited to vinyl chloride as opposed to a general plant inspection.

At 3:45 p.m. November 11 the writer phoned the area office to inquire of the delay and the need to retain key personnel beyond their normal working hours. Mr. Bill J. Stallings, Compliance Office, responded with apologies and indicated he would visit the plant alone at 1:30 p.m. November 12.

He arrived at 1:45 p.m. The receptionist phoned and we met him in the lobby. Amenities were exchanged and a hard hat and safety glasses were provided. He declined a manager's opening conference, but requested an employee representative be present. Mr. Sam Munn was contacted and joined Stallings, Leverton, and writer in the latter's office upstairs, Bldg. 1.

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Mr. Stallings proceeded forthwith about his business. He distributed his calling card and requested to see or be provided copies of the following:

- 1) Written operational plan for emergency situations
- 2) Written standard operating procedures of the plant respirator program.
- 3) Employee vinyl chloride hazard training records and content (specifically cancer warnings).
- 4) Medical examination statement to employees of suitability for continued exposure to VCM and use of protective equipment and respirators.
- 5) Employee personal monitoring records.
- 6) Photocopy of photographs from metallurgical lab showing metal fatigue of broken 1/2-inch nipple.

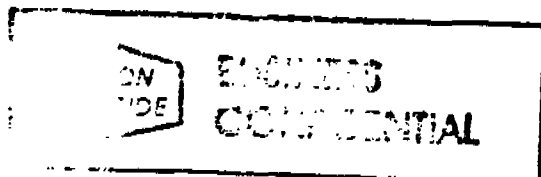
Mr. Ken Ross was apprised by phone of the Emergency Procedure request. Dr. Glenn was phoned for the Medical Statement. That for Mr. J. H. Coffey was specifically requested. Mr. E. N. Lund was contacted for the Respirator Program Procedure. Plant Procedures were reviewed to verify the lack of a written respirator program procedure. A draft copy of the one being prepared by R. J. Taylor was provided.

Dr. Glenn was met in his office. He presented a blank copy of his form "J" and showed his notation on Mr. Coffey's record that the form was presented to the employee. Mr. Stallings appeared pleased.

We traveled by car to Bldg. 117 where we signed the Regulated Area Roster. The automatic sampler intake in the control room was noted. We then walked to Bldg. 115 and met Mr. K. E. Ross. The laborers were observed cleaning up the spilled varnish. We then climbed to the top of the B-4 Autoclave. K. E. Ross pointed out the pipe nipple in question and the experimental heat exchanger. Comments noted the attached gauge and crow's foot. Signs of spillage were not apparent at this site.

In the control room the emergency procedure was provided as requested. Letters concerning the respirator program for VCM protection were noted.

The automatic monitoring system was surveyed. Bill questioned which point location had recorded "OVER". Ken answered that it was the laboratory during boil-offs. He noted that air supplied respirators are used. We looked at the VPC chart and sequential sampler switch panel. We signed out at Bldg. 117 and drove to Bldg. 61 Safety Office.



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Norman Lund pointed out instructions for cleaning respirators from M-S-A. Bill asked if we used M-S-A sanitizing solution. Lund replied, "No", that the solution used is UCC Soap. The laminated inspection tags were explained.

Bill requested a private conversation with Sam Munn. J. B. Leverton's office was offered. After Sam had departed, Bill indicated that we apparently were doing a good job so far as employees were concerned. Sam had no complaints and was defensive of our plant respirator program. Bill suggested that it would have been more desirable to have an employee representative who was involved with vinyl chloride.

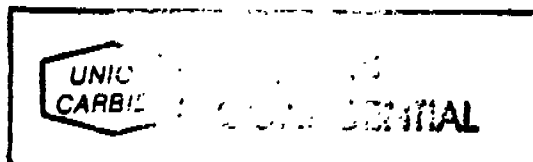
A closing conference was held privately with Mr. Nickles. He departed the plant about 4:30 p.m. He was impressed with the computerization of records and monitoring. He indicated that he would recommend to the Area Director, Mr. Robert Griffin, that a citation for a non-serious violation be issued for failing to have a written procedure for our plant respirator program.

Respectfully submitted,



D. E. Deese
Industrial Hygiene Director

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