

FILE MEMORANDUM

May 20, 1975

SUBJECT:

VINYL CHLORIDE SAFETY ASSOCIATION
BOSTON MEETING - May 15, 1975

There were more than 70 attendees representing manufacturers of VCM or PVC in eight countries. A list of the attendees will be supplied by VCSA at a later date.

A copy of the agenda is appended.

The first subject on the agenda was a discussion by Mr. Madden of Firestone of the meetings of the SPI Steering Committee with the EPA relative to the development of an environmental standard. In spite of what was considered to be a very cooperative spirit on the part of EPA personnel, the latest proposed standard would indicate that those writing the standard have no communication with those who met with the SPI group. Although the steering committee feels that they are back to ground zero, they have scheduled another meeting with EPA for May 20th and the following items are among those to be discussed:

1. The proposed 10 ppm limit on fugitive emissions.
2. The requirement for sealless pumps.
3. Sampling procedures and sampling retention time.
4. Record keeping.
5. Leak detection procedure.
6. Water emission requirements.
7. Oxy chlorination vent requirement.
8. Monthly material balance requirement.

There was some discussion of economic impact even though the standard is being developed under Section 112 which gives no consideration to economics. There was also mention that the economics committee of SPI will meet further with EPA officials on May 28.

Foreign activity in environmental controls was reported as follows:

- Germany - They have a standard of 0.3 mg/M³ for 99% of the year at the plant border.
- U. K. - There is no official requirement at the present time, and it is anticipated that any future standard might relate to stack height. There seems to be some confusion as to what agency has jurisdiction in these affairs.

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Sweden -- There are no emission rules at present and it is believed that they will follow the lead of the U. S. EPA. They are currently monitoring 1-2 workers per day, six hours per day and the average of 70-80 measurements made in the first quarter of 1975 was an exposure level of 1.1 ppm with 6 ppm being the highest single reading.

Two companies reported their experiences with OSHA in applying for variances to the standard.

- B. F. Goodrich was granted a variance in the respirator protection program permitting the use of half masks with cannister for low level exposure and air line for high level exposure up to 1000 ppm. No variance was granted above the 1000 ppm level. They believe that the employee acceptance of a respiratory program is important and used this argument to obtain the variance. They also requested a variance permitting the use of a cannister throughout an 8 hour work day providing the actual exposure time is not above 4 hours. Although this variance was not granted, they were led to believe by Mr. McClure that some clarification would be made relative to the 4 hour use life of the cannister and it has been the experience in the Southeast, at least, that the area director accepts the principle of a 4 hour life relating only to exposure time.
- Stauffer requested and obtained a variance relieving them of the responsibility of a continuance monitoring and alarm system through June 30th. They felt that it was necessary in view of delivery and installation time to seek a variance to protect themselves from citations.

Air Products advised that they are monitoring personnel within the respirator mask in order to determine and record the actual level of breathing air as apposed to the standard which requires monitoring without consideration for the use of respirators. They have requested a variance because in order to do this they must modify the mask from that approved by NIOSH.

There was considerable discussion on the subject of producing a central source of suitable breathing air including the problems of purification and rehumidification. It was suggested that where employees are given the responsibility of monitoring respiratory equipment that they be made to sign a statement accepting that responsibility. One company reported that a citation has been issued to a company for not maintaining this equipment.