

INTER OFFICE MEMO



TO R. A. Chartier /
 FROM F. R. Klebacher
 SUBJECT ORC VINYL CHLORIDE TASK FORCE UPDATE

AT Assonet
 AT Assonet

DATE February 25, 1974

COPY TO R. H. Carte
 S. Cupach
 D. C. Foster
 E. J. Gottman

I have just received a communication from the ORC on the current efforts of our task force group.

A summation of the information currently available leads to the following conclusions.

1. There is a significant and demanding health hazard, not specifically identified, in the manufacture and use of vinyl chloride.
2. The Assistant Secretary of Labor will, in all likelihood, propose an Occupational Safety and Health Standard for the process of manufacturing vinyl chloride.
3. Although an Emergency Standard may be issued, industries initiative and cooperation make a 6(b) proposal more probable. 6(b) is an OSHA procedure for promulgating a new industry standard.
4. The Standard will be work practice in nature and interim pending further information.

Written response to the Federal Register announcement (1/30) is open until Feb. 28. The record for the NIOSH briefing (Feb. 12) is open until March 8th. It is most likely that NIOSH and OSHA will undertake to look into the processes which precede and which follow the present manufacture of vinyl chloride resins.

OLI 5278

The ORC Task Force should consider four aspects of the work practices.

1. An analysis - and favorable or unfavorable reasoned judgements as to each separate items in the NIOSH recommendations (these have been done here in our discussion with R. Carte and New Haven personnel).
2. A work practice standard which recognizes there are different workplace circumstances, which is "performance" in expression so as to be adopted, but which is consistent with the current state of knowledge as to the requirements for worker protection (a copy of a second draft is attached).
3. A rebuttal to the contentions of zero exposure, and include vinyl along with the other carcinogens.
4. A position as to the need for, and willingness to cooperate in, research and investigation of employee exposure in the processes which precede and follow the manufacture of vinyl chloride.

The next assignment of the task force then is the preparation of a written statement to be filed (before 2/28) as part of the fact finding hearing record and to be the basis for further use in rule-making proceeding. For these purposes the Task Force is asked to reconvene on Feb. 26 at 10:00 AM in the ORC offices at 1660 "L" Street, N. W., Washington, DC.


F. R. Klebacher

FRK:jaa
Attachments

F. R. KLEBACHER
FEB 22 1974

TENTATIVE SECOND DRAFT

February 11, 1974

Occupational Safety and Health Standard
Manufacturing Vinyl Chloride & Its Related Polymers

1. Scope and Application

This standard applies to the process of manufacturing vinyl chloride (chloroethene, Chemical Abstracts Registry number 75014), and its related polymers.

2. Work Practices and Task Methods

A. Cleaning Reactors and Other Closed Vessels

There are a number of process methods for emptying and flushing reactors; if after emptying and flushing, the reactor is not sufficiently clean to be reloaded and it becomes necessary for an employee to enter the reactor the following shall be included among the work practices:

- i. the reactor shall be force ventilated until the air therein has reached a level below the applicable Threshold Limit Value and such ventilation shall continue as long as an employee remains in the reactor; (Other standards applicable to employee entry into confined spaces shall be observed)
- ii. protective outerwear clothing including full coveralls, head covering, gloves and footcovers shall be worn while cleaning the reactor. Such clothing contaminated by accidental spills is to be changed as soon as possible.
- iii. Polymer or other material removed by the employee entering the vessel shall, as soon as practicable, be placed in a closed container, removed from the work area and disposed of in such manner as not to create a hazard.

B. General Work Area

- i. Ventilation shall be applied as necessary to maintain air, at/near employee breathing zone in the work place, below the applicable Threshold Limit Values for Vinyl Chloride.
- ii. The employer shall have established an emergency conditions plan, including assigning and training employees for their specific duties and precautions in such conditions.
- iii. Each unloading line and each vapor equalizing line shall be equipped with vent connections permitting, at the completion of unloading, pressure to be vented, and the hose purged with an inert gas to a point remote from employees' workplace.

3. Work Place Air Sampling and Analysis

- A. Work place air in employee breathing zone shall be sampled and analyzed according to professional Industrial Hygiene methods, procedures, and frequencies.
- B. Records of air sampling and analysis, identifiable with the specific work place, shall be made of each sampling and analysis. Such records shall be retained for at least 20 years after the date of entry, and shall be available to the Secretary of Labor, and the Secretary of Health, Education and Welfare.

4. Signs

Entrances to those physical areas of an establishment to which this standard applies shall be posted with signs bearing an appropriate legend such as:

HAZARDOUS AREA
AUTHORIZED PERSONNEL ONLY
NO THRU PASSAGE PERMITTED

5. Training

Each employee prior to being assigned to work at a place of employment in which this standard applies shall receive such training and instruction as may be necessary to acquaint him with the hazard, if any, of the process to which this standard applies, the requirements of this standard and his responsibilities with regard to this standard.

6. Physical Examinations

- A. Each employee who is directly assigned to work in a manufacturing process to which this standard applies shall be provided such physical examination and medical surveillance as is designated to be applicable by the Medical Profession.
- B. Records of the above medical procedures shall be made and shall be identifiable with the specific workplaces to which the employee has been assigned. Such records shall be retained for at least 20 years after the employee leaves employment of the employer.
- C. Such records shall be available to the employer, the Secretary of Labor, and the Secretary of Health Education and Welfare. Physicians designated and authorized by any employee or former employee shall have access to such employee's medical records.

7. Effective Date

This standard shall become effective on and after ____.