



Interoffice Communication

To Distribution
From R. G. Weiss, Process Engineering, Ponca City
Date March 17, 1975
Subject Compliance Guidelines

*Spoke with Adewon
on 4/3/75 about 8 hr.
sample. Will continue 8 hr. at
VCM pvt. & ch. on what is
necessary for 8 hr. tests*

why??

Our Legal Department has given the strong interpretation of monitoring that includes 8-hour personnel dosimetry. This type of sampling will be required monthly according to Section 1910.93q(d)(2)(i). Although if an employee is exposed below the permissible exposure limit but greater than the action level of 0.5 ppm, the monitoring must be conducted not less than quarterly. This monitoring can be discontinued for any employee when at least two consecutive monitoring determinations, made not less than five days apart, show exposures for that employee at or below the action level of 0.5 ppm (Section 1910.93q(d)(2)(iii)).

By conducting our monitoring program with the two forementioned provisions in mind, it should be possible to eliminate the sampling of several employees completely and decrease the frequency for many unless there is a production, process, or control change which may result in an increase in the employee's exposure to levels above the action level. This last phrase is important to keep in mind.

However, if these changes in monitoring frequency are possible, this does not alter the intent of our medical surveillance program to include all employees. Although according to the Standard, medical surveillance is not required for employees whose exposure is less than the action level.

The requirement to notify employees of overexposure within 10 working days relates only to the required monitoring (see Section 1910.93q(d)(2)(i) and (ii)). Therefore, if continuous monitoring is used to satisfy this requirement, the results need be reported only monthly or quarterly as appropriate. The entire monitoring results must be included but may be reported in appropriate summary form that indicates the total extent of exposure. Notifications must be in writing and individually delivered (Section 1910.93q(n)(3)). If a regular program of exposure reduction and control has been implemented, such information need be delivered only once and may thereafter be cited.

Question was raised as to the overall merit of the respirator waiver form. Inasmuch as the employee has the right to change his mind as often as he wishes, concerning his desire to wear the prescribed respiratory protection, as long as the exposure is below 25 ppm. This choice is the employee's until April 1, 1976. Since it would be a most difficult task of policing, it has been decided not to use the waiver form.

VVC 000020598

Distribution
Page 2
March 17, 1975

The choice of wearing respirators for exposures of 25 ppm or less will be explained to the employee during the training sessions. Wearing of the respiratory protection under 25 ppm is entirely up to the employee, and the Standard does not require that the plant management police the wearing of these respirators under that exposure level.

All employees should be encouraged to participate in the medical surveillance program, although there may be individuals who for one reason or the other choose not to consent to part of the testing. After all persuasive measures have been taken, the medical waiver form should be signed. If only part of the program is refused, cross out "medical surveillance" on the form and fill in the part of the program that the employee has declined. It is necessary to have the employee initial this change when signing the waiver. A revised waiver form to include the forementioned change and to clarify the 0.5 ppm is being reviewed by the Medical and Legal departments.

According to Section 1910.93q(k)(2)(i), examinations shall be provided every 6 months for each employee who has been employed in vinyl chloride or polyvinyl chloride manufacturing for 10 years or longer. The Legal Department has drafted a proposed petition for variance of this requirement, based mainly on the reasoning that the 6-month blood and urine analysis is as adequate as the 6-month examination.

All employees have to be given the opportunity for medical surveillance; this includes temporary employees. The OSHA Act defines employee as "an employee" with no differentiation between temporary or permanent. This means that all people hired for the Lake Charles VCM plant turnaround will have to be given the opportunity of the medical surveillance program.

According to Section 1910.93q(k)(4) of the Standard, "a statement of each employee's suitability for continued exposure to vinyl chloride including use of protective equipment and respirators, shall be obtained from the examining physician promptly after any examination. A copy of the physician's statement shall be provided each employee." The key word in this section is "examination." The Medical Department defines "examination" as any time the physician looks at the employee for medical reasons. This could qualify under the emergency situation, Section 1910.93q(b)(3), making it necessary for an employee to have a release statement prior to returning to work.

VVC 000020599

Distribution
Page 3
March 17, 1975

Letter out to Genie & Industrial

Large contracting firms working in the plants need only to be informed that the plant is engaged in the manufacturing of VCM/PVC. With smaller "fly by the seat of their pants" firms, it will be necessary to expand on the Standard. As for those contracted services, where personnel are in the plant year round, it would be advantageous that they be included in the training and medical surveillance programs of the plant.

*Done with
of 3/17/75*

Showing of the slide presentation and the hands on² training for the use of respirators can commence at any time. Having the employees participate in this phase of the training may give a better indication of the quantity of replacement canisters needed. Although, showing of this program needed to be repeated after April 1 to comply with the Standard.

All protective coverall garments should be made of materials impervious to vinyl chloride. Cotton coveralls do not fit this category unless they are impregnated with a substance that qualifies them impervious.

The Scott pressure demand low pressure Ska Pak with the egress cylinder has been approved by NIOSH, although Scott is having difficulties in production of this unit. No new date has been given on its availability.

R.G. Weiss

R. G. Weiss
VCM Health Coordinator
Chemicals Division

tb
Distribution:
LNV:EMS:RTF:RDG:JADeB:DVP
PAS:CHP:FMW:CEG:ERA:JFG

VVC 000020600