

NOVEMBER 5, 1974

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COMMENTS ON OSHA VCM STANDARD AT
VCSA MEETING - NEW ORLEANS, OCT. 31 - NOV. 1, 1974

This report covers the comments of the second day of the above meeting, the subject being the permanent VCM standard. It will be given only limited circulation since it contains interpretations and conjectures which may not be valid and could cause much confusion and argument over the standard. Another report will cover the first day when general safety considerations were discussed and will receive normal circulation.

John Barr of Air Products interpreted the standard point by point as he understood it and in the light of the clarifications gotten from OSHA by Air Products lawyers. While I have respected and admired John Barr's capabilities, I felt he took a pessimistic attitude toward the standard, leaning toward the most difficult interpretation of each point. He seemed defeated and petulant. The result, if his advice is taken, will be much use of gas masks, much reporting, protective clothing throughout the plants, many hours of training, more of each of these and other practices than we expected to do. OSHA will expect to find in all plants as much activity as they find in a few.

After seeing the combination of very tight interpretation by some and general confusion among some others, both Bill Madden and I refrained from asking a lot of questions feeling we would not get additional light. This attitude was apparently shared by a few other people. For example I questioned John Floros of Great American who didn't seem caught up in the pessimism and got the answer that he was going to make his own interpretation, look after protecting his employees as best he could and let the compliance officers tell him if they were unhappy.

I don't feel the meeting was a waste of time, however. We did get a good look at what some of the companies are doing and planning. A tabulation of comments as given follows.

Interpretation of OSHA Permanent VCM Standard

John Barr - Air Products (Many comments with which we are in agreement are omitted)

1. Expects individual directives as they are given to be more stringent than the standard as written.

2. Said all companies have consolidated their suits with BFI in the second court in New York; that oral arguments are to be given in December, 1974.
3. Air Products will not be in compliance by January, 1975-- too much to do.
4. Said all provisions cover everyone who comes into plant - truckers, telephone repairmen, canteen servicemen, etc. Felt PVC makers would wind up negotiating with contractors, suppliers, telephone company, etc., on handling medical programs, records, reporting on their employees. Felt these type people would be reluctant to deal with PVC manufacturer
5. Felt we would find shipment of small lots by common carriers a problem.
6. All but one company (a monomer manufacturer) expect to do area monitoring for alarms plus personnel monitoring.
7. Felt a fence around regulated areas was not necessary unless entrance could not be controlled otherwise. Apparently in some of the plants where the PVC plant is only part of a large complex, there is much general travel through the PVC area.
8. Mentioned that regulated areas need not all be permanent, temporary regulated areas can be set up.
9. Felt that notifying employees once a month of their exposure when they are monitored personally was not enough. Interpreted that since area monitoring will show daily that they are over 1 ppm TWA, they must be notified daily. Had ruling from OSHA that posting on bulletin board is not adequate notification.
10. Claimed Air Products lawyers were told by OSHA that 100 ppm VCM in the atmosphere constituted an emergency condition requiring notification to OSHA and employees and medical surveillance. We did not intend to consider such a low level an emergency and again will need a clarification. Dr. Brookman in a conversation with me later said he felt Air Products had misunderstood OSHA regarding the 100 ppm level and that OSHA did not consider this the emergency level mentioned in the standard but rather the level above which a man had to wear the auxiliary bottle to avoid mask changing.
11. A man from General Tire claimed to have a ruling from OSHA that auxiliary bottles need not be carried but only kept in the area. Based on Dr. Brookman's comment above, this would appear to apply only up to 100 ppm.
12. John Barr said only Scott air packs are approved so far.
13. Said they were told by MSA that MSA will not submit a cartridge type mask to NIOSH. NIOSH test requires a humid air stream be passed over the cartridge before it is tested with VCM. MSA says moisture in the carbon will prevent VCM adsorption.

14. Picked up comment that Norsk Hydro had shut down their PVC plant because of employee fears and would not start up till this problem is solved. Norsk Hydro representative was present but I did not personally talk to him.
15. Air Products will use canisters in warehouse and air line in poly.
16. Barr stated that a separate OSHA regulation covering air masks requires that employees leave the exposure environment when 90% of the auxiliary air supply is exhausted.
17. Said a safe haven for mask changing must be provided.
18. A side comment on securing leaks above 36,000 ppm was that "life rescue" might be interpreted to include the lives of people outside the exposure area who might be injured by an explosion. There was little support for this interpretation. General comment was that the rule this refers to--no safing out over 36,000 ppm--could not be obeyed.
19. Felt that the effect of overtime would be to add to TMA. For example, 0.5 ppm for 16 hours would equal the allowed 1 ppm TMA for 8 hours.
20. Felt protective clothing (work clothes) was necessary in all regulated areas. My interpretation is that it is only required where contact with liquid VCM or reactor cleanings is likely.
21. Had legal opinion medical surveillance could be discontinued for any employees who go to jobs in areas below the action level or where areas change to less than the action level. Someone commented that they will continue medical surveillance of all employees once exposed and all retirees at company expense and of quits at their own personal expense.
22. Barr mentioned that all silos, reactors, sample bombs, etc., will need labeling. He wondered about pipe lines.
23. Air Products will microfilm records.
24. A poll was taken of estimated TMA values for the various companies. Some are monomer manufacturers. This table may be grossly in error since TMA values are not truly measured but in most cases are estimates from individual checks. This tabulation indicates the number of companies estimating the various exposure levels.

	<1ppm	<5ppm	<10ppm	<25ppm	<50ppm
Poly Area	0	3	14	13	2
Finishing Area	1	19	13	0	0
VCM Loading or Unloading	2	27	8		
Other (compounding)	0	30			

25. Fifteen companies said they have control rooms. All of these said they have a separate air source from outside. All expect to get the control rooms below 1 ppm. One company said their control room is better than their lunchroom.
26. Joe Mudd of General Tire at this time took the podium and said they will use 3" x 4" gummed labels for trash containers etc., 12" x 14" signs with half inch letters for areas and a stamp for bags.

27. Said Boyd of OSHA had told General Tire lawyers that the optional use of masks to 75 ppm ceiling did not override the 1 ppm TWA but only the 5 ppm ceiling. If this were true, it would have meant essentially 100% mandatory use of masks. A number of companies were accepting this interpretation and planning for mandatory use. We subsequently got a clarification that our earlier interpretation was correct - masks optional to employees up to 75 ppm regardless of 5 ppm ceiling or 1 ppm TWA.
28. General Tire washes their own protective clothing.
29. Kudd said their president had ruled that there would be no VCM in their resin going to fabricating plants. It appeared their market is essentially all captive. They are going to restrict the problem to the PVC producing plant.
30. They will strip at 175°F for 75 minutes and expect to have 10 ppm residual VCM. They have run tests which indicate this.
31. They don't intend to pipe VCM vapors outside work areas as part of solution since this will run afoul of EPA.
32. Nineteen companies claimed to have air piped through the plant. Five use water sealed compressor. Some use bottles. Five have carbon filters on breathing air compressors. Eleven have particulate filters. Three monitor air quality. General feeling was that buying air in bottles was too expensive for the long run.
33. German expert now with residual VCM in resin at dryer discharge was given by the representative from Lucker.

	<u>Max</u>	<u>Average</u>
1 PVC	110 ppm	5 ppm
2 PVC (coarse)	100	100
Suspension	1000	Range 10-1000
Mass	1000	Range 100-1000

34. Sixteen companies said residuals in their suspension resins are below 1000 ppm. Five said below 500 ppm. (These polls should not be taken literally. The questions often don't fit properly, are poorly posed, are hard to answer or are misunderstood. Also, each company may have a different answer for different areas or processes.)
35. Goodrich is checking residual VCM via what they call a "head space" method with a gas chromatograph. Advantage is multiple samples at once. They will submit the procedure to the secretary who will mail it to members. A comment was that automatic injection of the sample improves reproducibility.
36. There are additional comments regarding compliance with the OSHA standard in the general safety notice.

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Enc. 100

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