

TO

FIELD POINT OR DEPT. & BLDG. NO.

DATE YOUR LETTER

Ron Moore

FROM

FIELD POINT OR DEPT. & BLDG. NO.

DATE THIS LETTER

Diana Friesz

December 31, 1991

SUBJECT

SUBJECT: VCL EXPOSURES GREATER THAN 1 PPM WITHOUT RESPIRATOR PROTECTION

During 1991 there were 12 vinyl chloride exposures exceeding 1 ppm that occurred without respirator protection. Ten of these exposures were to operators charging and recovering lo sope polys. A summary of the exposures is given below:

<u>Operator</u>	<u>Date</u>	<u>Job</u>	<u>Resin Type</u>	<u>No. of Charges</u>	<u>Exposure (ppm)</u>
	1/4	recover 217, G-2, X-500	173 paste	5	1.3
	1/11	charge/recover lo sope	124 paste	6	2.8
	1/14	charge/recover lo sope	171	6	1.6
	2/26	charge/recover lo sope	178	5	1.5
	3/2	charge/recover lo sope	178	10	1.4
	8/21	helper-dumped poly scrap	178	8	14.0
	9/6	charge/recover lo sope	171	9	1.0
	9/27	charge/recover lo sope	178	9	1.2
	9/30	charge/recover lo sope	173	9	4.8
	11/01	charge/recover lo sope	173	6	1.6
	11/04	charge/recover lo sope	173	10	2.6
	12/01	charge/recover lo sope	171	10	3.5

Clearly there is a VCL exposure problem involving the lo sope charge/recovery job. Although some operators have had repeat exposures, there are enough different operators on the list to indicate that this problem may be more than just a matter of poor individual work practice.

Earlier in the year I asked _____ a to select a lo sope charge/recovery operator to monitor for VCL exposure with a gas badge and at the same time follow on the job with an OVA.

_____ was monitored on 5/9/91 (resin type 178/10 charges). No unusual or excessive sources of VCL exposure were detected during this time and _____'s full-shift VCL exposure average was 0.81 ppm. Some VCL exposure was detected during the short-term task of changing recovery bag filters. However, this job is already identified as a respirator required task and the short-term monitorings showed exposure of only 3.10 ppm (east filter) and 4.30 ppm (west filter) (the VCL short-term exposure limit is 5 ppm). Averaged into a 10-hour exposure, this short-term task should not create a time-weighted exposure exceeding 1 ppm. Either the lo sope operators who have had high exposures performed the job functions different than _____ or else we are missing something.

As you know, OSHA prohibits VCL exposure above 1 ppm with out respirator protection. Considering that high VCL exposure to the lo sope charge/recovery operators is not new, we could be subject to a serious or even willful OSHA violation.

In addition, there are a number of Congressional bills pending that would put more criminal liability teeth into OSHA violations. The proposed OSHA Criminal Reform Act seeks to establish a five year prison term for a first offense willful violation that results in "serious bodily injury". Another bill would establish a five year prison term for a willful violation that "recklessly endangers human life" with no need for death or injury to have actually occurred.

We need to determine why the lo sope charge/recovery operators are receiving high VCL exposures and correct the problem right away. I suggest at least two more gas badge monitorings combined with OVA follow-through checking for operators on this job who have already had high exposures (_____. I will also ask _____ to begin monitoring all lo sope charge/recovery operators for VCL on a monthly basis and to put added emphasis on recording any tasks or sources of VCL that the

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operator may have encountered during the monitoring period. If you think of any other monitoring that should be done, please let or me know. If we cannot quickly correct this problem, we really have no other choice than to require respirator use for the duration of the lo sope charge/recovery job.

Diana

Diana Friesz

DF/bs/WP/9124

cc: Phil Donataccio
Dan Kidd
Dave Giffin
Ken Prather
File

NGC 14664

TO _____ FIELD POINT OR DEPT. & BLDG. NO. _____ DATE YOUR LETTER _____
FROM Ron Moore FIELD POINT OR DEPT. & BLDG. NO. _____ DATE THIS LETTER _____
SUBJECT Diana Friesz 11/2/89

VINYL CHLORIDE PERSONNEL MONITORING SUMMARY

As you requested during our recent conversation concerning VCL exposure in the PVC production areas, I have put together the VCL monitoring results for this year (complete through September). This data is then compared to data from 1988 and 1987.

	TOTAL MONITORINGS (POLY AND DRYER BLDGS)	AVERAGE VCL EXPOSURE LEVEL	EXPOSURES GREATER THAN 1 PPM	EXPOSURES GREATER THAN 1 PPM W/O RESPIRATOR PROTECTION
1989	312	1.43 ppm	113 (Poly)/1 (Dryer)	36 (Poly)/1 (Dryer)
1988	314	1.15 ppm	72 (Poly)/13 (Dryer)	24 (Poly)/13 (Dryer)
1987	248	1.06 ppm	49 (Poly)/4 (Dryer)	15 (Poly)/4 (Dryer)

Most all of the data indicates a worsening situation. The number of exposures greater than 1 ppm has nearly doubled over each year. The number of exposures greater than 1 ppm without respirator protection shows a corresponding increase. The only good news is that VCL exposures greater than 1 ppm have been significantly reduced in the Dryer Building. And it is essential to maintain this improvement in order to prevent the Dryer Building from becoming a VCL regulated area.

The OSHA VCL standard allows respirator use as supplemental protection where engineering and work practice controls cannot reduce the exposures to at or below the permissible exposure limit. Since 36% of this year's monitorings exceed 1 ppm, OSHA could reasonably judge that our program relies more on respirator use to protect employees than on actually reducing exposure levels. We could also be cited for the number of exposures greater than 1 ppm that occurred without respirator protection.

In order to reduce the potential for an OSHA citation, we need to seriously look at the VCL exposure problem or possibly establish a task force group for this purpose. I think that the initial plan that we discussed to require an OVA check for any line breaking in the Poly building will improve respirator use compliance as well as to identify sources of high VCL exposure.

Please call me at 407 if you have any questions.



Diana Friesz

rdl/E312

cc: P. Donataccio
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