



Interoffice Communication

To : Safety Department Procedure File
From : Jerald Uptain
Date : January 30, 1975
Subject : Industrial Hygienist Responsibilities for VCM Standard Compliance

I. Temporary Standard

1. Personnel Monitoring

- a. Take dosimetry samples per compliance plan for temporary standard.
 - b. Maintain dosimetry equipment: pumps, bags, etc.
 - c. Review all results and initial each record.
 - d. Advise each employee who has an overexposure and obtain signature on the appropriate record sheet.
 - e. Records
 - (1) Individual Dosimetry Sheets - Maintain in file(s), in chronological order.
 - (2) "Personnel Monitoring Summary" Books - Maintain and record all results on an up-to-date basis.
 - (a) Original Copy-In Industrial Hygienist's office
 - (b) Plant Managers Copy-Plant Manager's office
 - (c) Chief Process Engineer's Copy-Process Engineering office.
 - (3) Weekly Summary Sheets - Maintain and record all results on an up-to-date basis.
 - f. Reports
 - (1) Weekly Progress - Provide, on Thursday mornings, to Safety Director, the number of test results during the previous Monday through Sunday period, categorized as follows:

no. ≤ 1.0 ppm, VCM
no. from > 1.0 to < 5.0 ppm, VCM
no. from > 5.0 to < 25.0 ppm, VCM
no. from > 25.0 ppm, VCM
 - (2) Weekly Summary Sheets - Send one copy, weekly to:
Dick Weiss-Ponca City
Oran Steffey-Ponca City
- #### 2. Area Monitoring - Take one, 8hr. gas bag sample in each of the following areas each week:
- a. Management office area
 - b. Accounting/Purchasing office area

- c. Compress Warehouse
- d. Prairie Warehouse #11
- e. Prairie Warehouse #14
- f. Prairie Warehouse #16

Maintain all results in a special file on an up-to-date basis.

II. Personnel Monitoring under Permanent VCM Standard

1. Write final version of personnel monitoring plan as required. Include provisions for notifying employees of overexposures. include:
 - a. Sampling Methods a
 - b. Sampling Frequencies
 - c. Data Collection
 - d. Data Processing
 - e. Reporting
 - f. Record Keeping
2. Implement and maintain monitoring program
3. Maintain dosimetry equipment: pumps, bags, etc.
4. Records - Maintain following records, subject to changes in monitoring plan:
 - a. "Employee VCM Work Experience Report"-one per employee per month. Maintain in files, properly identified for future retrieval.
 - b. "VCM Continuous Monitor Sampling Summary" sheets - maintain file of all used, properly identified for retrieval.
 - c. "Aberdeen Plant VCM Area Concentration Sample-Gas Bag Method" sheets-maintain file of all used, properly identified for retrieval.
 - d. "Aberdeen Plant VCM Personnel Dosimetry Sample-Gas Bag Method" sheets-maintain file of all used, properly identified for retrieval.
 - e. "Employee VCM Exposure Report-Aberdeen Plant" sheets-maintain file of sheets, on basis of one per employee per month. File for ease in retrieval.
 - f. Honeywell Continuous Monitor Strip Charts.

III. Honeywell Continuous Monitors

- A. Insure proper installation and check out of operation to include:
 1. Sampling lines and filters
 2. Programmer/analyzer units
 3. Chart recorders
 4. Warning lights and buzzers.
- B. Confirm establishment of an effective maintenance plan.
- C. Confirm the verification of the 95% confidence level to be done by the plant Chief Chemist.
- D. Monitor maintenance of units. Receive, review, use, and store all calibration sheets.
- E. Independently check operation of all units on a routine basis.
- F. Monitor high-level alarm functioning and rule compliance with same.
- G. Receive, check, and store all charts.

- H. Receive, check, use, and store all log sheets.
- I. Utilize continuous monitor units as prescribed in the personnel monitoring plan.
- J. Supervise location of sampling points, including additional, auxiliary points, and methods of using monitors.
- K. Records
 - 1. Strip Charts - To be filed for permanent storage, clearly identified as to:
 - a. Date(s)
 - b. Time(s)
 - c. Location of sampling points
 - d. Chart Span, ppm, VCM
 - 2. Daily Log Sheets - File for permanency
 - 3. Calibration Sheets - File for permanency
 - 4. "VCM Continuous Monitor Sampling Summary" sheets - File for permanency.
- L. Reports
 - 1. "Summary of VCM Concentration Excursions Above 25 ppm, VCM, As Measured with Honeywell Continuous Monitors" - Publish to all department heads every Thursday, for the previous Monday through Sunday period.

IV. Employee Access to Monitoring Results

Arrange for distribution of letter which explains their access to results to all employees, following approval by Plant Manager.

V. Regulated Areas, Signs, Entrance Logs

A. Definition of Regulated Areas

- 1. Continue definition of regulated areas through use of area gas bag measurements.
- 2. Provide process engineering with readily available information on all monitoring and measuring as required.

B. Signs

Have regulated area signs posted when permanent standard goes into effect.

C. Entrance Logs

- 1. Place entrance logs and associated equipment at all gates normally used by personnel.
- 2. Instruct guards and receptionist in correct use of entrance logs.
- 3. Supervise collection of completed logs by Head Security Guard and Warehouse Superintendent.
- 4. Store all logs in files for permanency and retrieval
- 5. Monitor employee and visitor compliance with log use rules.

D. Records - All entrance logs.

E. Vehicle Signs and Product Labels - monitor correct use.

VI. Hazardous Operations

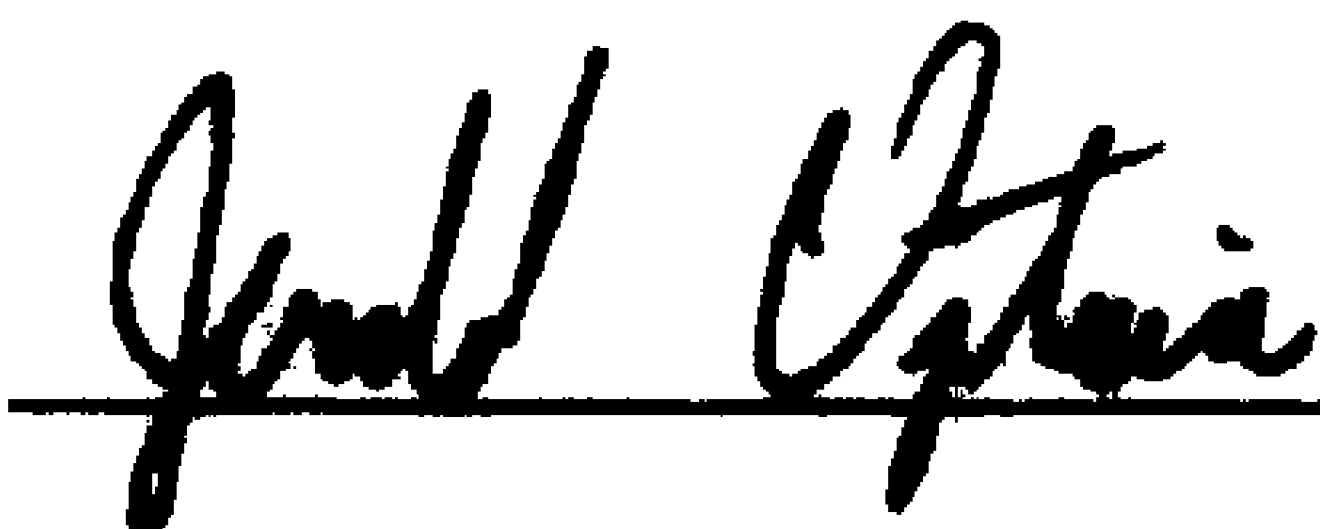
A. Signs

- 1. Have hazardous operations signs posted when permanent standard goes into effect.

- A
2. Maintain small stock of signs
 3. Prepare 2-3 portable signs and maintain for emergency use.
 4. Monitor employee and visitor compliance with signs.
- B. Protective Clothing
1. Monitor supply, usage, and disposal of disposable garment, gloves, etc.
 2. Control type of protective garments, gloves, etc. used for hazardous VCM operations, including modification.

VII. Respiratory Protection

- A. Plant-Wide Respirator Program - Write and establish a plant-wide respiratory protection program per OSHA 1910.134, to include procedures for:
1. Inspection
 2. Cleaning
 3. Repair
 4. Recordkeeping
- B. Monitor equipment needs for VCM
1. Number and type
 2. Use
 3. Location
 4. Expendables and spare parts.
- C. Supervise acquisition and distribution of respirators.
- D. Establish procedures for selling or lending equipment to contractors or other non-plant personnel.
- E. Establish spare parts in stockroom
- F. Respirator Release Statements
1. Get one form completed by each employee.
 2. Store statements for future reference.
- G. Records
1. Respirator Release Statements
 2. Other records as defined in plant-wide respirator program.



Jerald Uptain
Safety Supervisor

cc: All Safety Department Personnel