



INTERNAL CORRESPONDENCE

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R. N. WHEELER, JR.

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CHEMICALS AND PLASTICS

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DATE May 30, 1974

SUBJECT Vinyl Chloride Safety Association
Meeting - May 24, 1974
Cleveland, Ohio

This special meeting of the Vinyl Chloride Safety Association, attended by about fifty-five people representing twenty-seven of the thirty-seven member companies was primarily for the purpose of discussing OSHA's proposed permanent standard for VCM exposure published in the Federal Register of May 10, 1974.

There was re-affirmation of the previous policy that the association would not make any statements nor make any appearances at public or government hearings concerning the vinyl chloride exposure situation. Rather the group could best serve as a forum for exchange of information among the members, who are mostly plant people. We, in turn, can carry back ideas to our own company people who will participate in public hearings or deal with other associations (e.g. SPI, MCA).

Our next meeting is tentatively scheduled for October with a return to a normal format covering the whole spectrum of vinyl chloride safety activities. Health hazards will still be considered and discussed, but will not be the sole topic.

With the above "housekeeping" duties dispensed of, the meeting got down to the subject at hand. The morning was consumed with a resumé by each company represented of the exposure levels they were experiencing, maximum levels they thought they could live with, actions to be taken by their company in response to the proposed permanent standard, comments about OSHA inspections they had experienced, descriptions of monitoring methods, etc.

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Before reporting some of the individual company comments of special interest, a few observations of general nature are in order. Without exception, all members supported a TWA type maximum exposure limit. PVC producers generally thought they could meet about 25 ppm TWA. VCM producers were thinking a little lower than this - perhaps 10 or 15 ppm TWA. Quite a few members were quoting 40 or 50 ppm ceilings, but the consensus was that they could not meet this as an absolute ceiling - there would be excursions above this. A suggestion by Mr. Barr of Air Products of allowing a timed excursion above the ceiling of 10 - 15 minutes met with much favor as an excellent, workable idea!

Seven companies reported that they were now continuously analyzing fixed points. Agreement that area numbers tend to be higher than grab samples.

Almost all members reported that their companies were to testify at the OSHA hearings as well as support SPI testimony. Some felt that their representatives (usually higher management) at SPI and other similar meetings tended to be over-optimistic about what exposure levels could be achieved. I think and reported that vertical communications in this area at UCC is good. Many expressed the thought that the more companies who objected to the proposed standard, the better. Fabricators should be urged to testify also.

Highlights of some of the individual presentations follow:

PVC PRODUCERS

Air Products

Will make submittal to OSHA before June 10 to be separated into:

General Objections

- 1) Proposed standard is not necessary - will refer to asbestos case - cannot take risk of industry shutdown
- 2) Not feasible
- 3) Precedent of asbestos and 14 carcinogens in Federal Register of January 29, 1974.

Specific Objectives

Found twenty-five major points to object to in proposed standard the first time through.

At present 25 ppm TWA, 40 ceiling with a 15-minute excursion exemption would be okay. Perhaps in two to three years could accept a lower TWA - maybe 10 - but technology not yet developed.

Will try for an exemption for material containing less than 01. % VCM.

Will not protest wording that VCM is a carcinogen.

General Tire

20 ppm TWA okay - not sure on ceiling. Now finding 14 - 16 ppm in poly area, 4 - 6 ppm in finishing area.

Certainfeed

Have not operated so don't know what can meet, but think 25 ppm or so.

Conoco

Can meet 10 ppm TWA and 25 ppm ceiling at Oklahoma City. Overall can meet 25 ppm TWA and 40 ppm ceiling. By October 5, 1974 can meet 25 ppm ceiling at Aberdeen. Presently 300 ppm VCM in Oklahoma City resin, higher at Aberdeen.

Diamond Shamrock - Delaware City

25 ppm TWA okay.

Ethyl Corporation

Cannot meet 50 ppm ceiling. Most jobs within 25 ppm TWA. VCM plant as high or higher than PVC plant.

Firestone

SPI and individual presentation. Will say cannot operate at zero.

B. F. Goodrich (Herm Waltemate)

Will make a detailed statement to OSHA. Also work through SPI and possibly ORC.

Four major objections:

- 1) Exposure levels
- 2) Respiratory protection
- 3) Impervious suits
- 4) Reporting of results

Will support a step approach to exposure levels - 15 ppm TWA, 30 ppm ceiling.
In a three year period to 5 ppm TWA, 10 ppm ceiling.

Goodyear

25 ppm TWA, 50 ppm ceiling (but liked Air Product's idea of short term excursion). Scared to death by some of their ceiling data. There is a need to compare present exposures with past, but is ticklish. Their local union at Niagara Falls had been in complete sympathy with company until recently when suddenly the party line (OCAW) became no detectable.

Great American Chemical

Many definitions in proposed standard will shut down their plant. Zone samples have shown over 100 ppm.

Hooker Chemical

Will make individual and SPI presentation. Support 25 - 30 ppm TWA. Normally they're below 10 ppm but have seen excursions above 50 ppm.

Keysor - Century

Will present a written objection to OSHA. They have no TWA data. Have found up to 300 ppm ceiling.

Pantasote

Will follow a 25 ppm TWA/40 ppm ceiling but will have a hard time to meet. They find 0 to 25 ppm on operating floor, but over 50 ppm excursions such as reactor openings.

Robintech and Universal

Find 20 - 25 ppm on poly floor.

Stauffer Chemical

Will support industry. 25 ppm TWA, 50 ppm ceiling is their current thinking. Their top management is not knowledgeable in PVC.

Tenneco

Thinking in terms of 25 TWA, 40 ceiling. Liked the timed excursion idea. TWA perhaps to be on a weekly basis. They found that foreman have the highest exposures. They have a problem with bagging operation and feel the major problem is residual VCM in resin.

Uniroyal

Will probably make an individual presentation as well as support SPI. Can meet 25 - 30 ppm TWA.

Union Carbide

I indicated that depending upon the type of PVC plant we could meet from 10 to 30 ppm TWA and a 50 ppm ceiling, but not a strict interpretation of the ceiling. We would require a timed excursion. We will make an individual presentation to OSHA as well as support SPI. We will plead for TWA rather than ceiling. We have seen several hundred ppm in zone samples. We cannot meet some of the work practice items in the proposed standard and others we feel are unnecessary because they do not contribute to employee safety.

ICI (England)

Although they are not faced with the proposed OSHA standard, they presented these thoughts:

- zero exposure means shutdown -
- 10 ppm TWA can be met with their new plant -
- 20 - 30 ppm TWA can be met with their old plants
- they have peaks above 50 ppm - up to several hundred ppm -
- they are costing out engineering to get to 25 ppm TWA -
- they can perhaps get down to 10 - 15 ppm TWA -
- to get below 10 ppm TWA would require a complete new plant.

VCM PRODUCERS

Allied Chemical

Monomer production is less a problem than polymer production. Will use the SPI position. They see 20 - 30 ppm excursions at tank car loading. Very limited TWA information.

Conoco

Looks as though 10 ppm TWA is possible.

Dow

Daily monitoring of personnel. Area monitoring. Grab samples. The more samples they take, the more problems they uncover. Main problem areas are monomer loading and sampling. Their present levels are mostly at 5 - 10 ppm. They're in the process of making a proposal and asked the group's response to this timetable.

25 ppm TWA until July, 1975
10 ppm TWA until July, 1976
5 ppm TWA until July, 1977
2 ppm TWA until 1978
ceiling of 50 ppm throughout.

Response was unfavorable with particular objection to any proposal below 10 ppm TWA. In fact, Dow man from PVC copolymer plant at Midland voiced skepticism of meeting the proposal. Midland area samples showed 100 - 150 ppm peaks; carbon tube TWA's were generally 15 - 17 ppm although TWA's did range from 5 to 50 ppm.

Goodrich

TWA averages in their monomer plants were about 10 ppm. Stated they probably could meet Dow's timetable listed above.

PPG

In process of review. Favoring a TWA approach. Exposure generally below 10 ppm, but excursions above 50 ppm. Loading and sampling main problems. Will send in their recommendations to OSHA strictly as a monomer producer. Will point out that PVC producers have different and greater problems.

Shell

Of note is the fact that they had no representative at this meeting.

Some highlights of the afternoon session, devoted primarily to a discussion of the proposed standard, follow:

Goodrich is presenting to OSHA for consideration a completely revised standard.

About 90% of the companies are installing breathing air systems.

General agreement that the proposed procedure was a patching together of various documents and some instances where one section was not compatible with another.

Types of respirators allowed should be expanded to include "half" masks.

Definition of emergency should be changed - perhaps to the March 11, 1974 NIOSH proposal which stated that "Emergency" means an unforeseen circumstance or set of circumstances, such as a ruptured transfer line, resulting in the release of vinyl chloride sufficient to produce acute symptoms among workers exposed or having contact with vinyl chloride.

Any number of other valid objections to the proposed standard were expressed, but they were generally ones that have been discussed previously within our company and will not be repeated here.

Hopefully, these notes will help convey the "flavor" of industry thinking (particularly from plant personnel) to those on the front line of preparing Carbide's position at the OSHA hearings.

R. L. Frantz
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RLF/st

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