

HARVEY HUBBELL INCORPORATED
584 Derby Millford Road
Orange, Connecticut 06477
(203) 789-1100

14



harvey hubbell incorporated

July 22, 1974

Mr. David R. Bell
Office of Standards Development
Room 500
1726 M Street, N. W.
Washington, D. C. 20210

Dear Mr. Bell:

I understand that the deadline for comments on the draft environmental impact statement for vinyl chloride has been extended, therefore, we request that our comments contained in this letter be considered before a final environmental impact statement is issued.

Harvey Hubbell, Incorporated is a Connecticut Corporation with operations producing electrical wiring devices, outdoor lighting products, electrical control equipment, specialty electric cable, communications equipment and commercial plastic molded products. Our concern with the vinyl chloride impact statement arises primarily from our use of PVC in our plastic molding operation and in our specialty electric cable operation.

We are unable to offer technical substantiation for our comments beyond the attached report prepared by the Liberty Mutual Insurance Company at our Kerite Company Subsidiary, the producer of specialty electric cable.

We believe, however, that the attached report substantially confirms much of the comment at the public hearings on the proposed OSHA standard in regard to the almost non-existent hazard associated with the handling and storage of PVC in the diced or pelletized form.

The draft environmental impact statement of June 12, 1974 could be modified on page 22, by rewriting the last sentence as follows:

"Since the proposed OSHA regulation is concerned only with the worker potentially exposed, the migration of VC to the surface of the diced or pelletized PVC compound or of a PVC product has not been considered."

VVC 000005390

Mr. David R. Bell--2--July 22, 1974

We believe that this addition will make clear that the VC monomer is probably not present in detectable levels in the materials used for conversion to the final product. We can see the possibility that residual monomer may be released during the conversion process. We are concerned in this case with regulations governing the unloading, storage and handling of the diced or pelletized compound.

Page 23, first sentence of the second paragraph does not, we believe, express what was intended by the writer of the statement. We believe that there has been some confusion about the fourth stage product and that the term "extrusion stock" is intended to include milled pellets or diced material. We believe this inclusion should be stated specifically, and that the fourth box from the top on figure 1, page 24, should also be reworded to specifically include the diced or pelletized form of PVC.

We are concerned with the last paragraph on page 49 headed "(2) Worker Exposure." The second sentence of this paragraph uses the term raw materials to describe the material used in the fabricating stage. We believe that the general interpretation of the term raw materials would apply to a product prior to compounding and converting it into the diced or pelletized in-process material, and we recommend study of this sentence for the purpose of clarification of the meaning intended.

Page 53, last paragraph, states that "fabricated products include such items as....." In this case we again recommend that the description be modified to include specific reference to the pelletized or diced in-process material.

Pages 63 and 64 seem to understate the problem of potential interruption of production of vinyl chloride and PVC. We believe that an argument can be supported with substantial logic to the effect that conversion to the proposed OSHA standard can cause substantial interruption in the supply of both the monomer and PVC, that prices of the products may increase substantially, and that the competitive position of the manufacturers of the end products could be seriously affected by such reduction in supply and increase in price levels.

We must repeat, other than on the attached copy of an inspection report at our subsidiary's plant, we are unable to supply substantiating technical data, but we suggest that an examination of the record of the testimony at the OSHA hearings on the proposed regulation related to the environmental impact statement will produce testimony and, hopefully, test data which will support our position.

Sincerely,

VVC 000005391


William H. Gatenby
Vice President