

IGG: JGL: MAMG RF
XF: VIAC

TO: Carl Kerfoot / Allen Nielsen

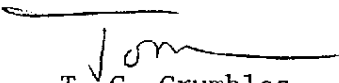
FROM: T. G. Grumbles
DATE: December 3, 1987

Interoffice
Communication

SUBJ: ALFONIC 1618-65 TESTING: REPORT CORRECTION

VISTA

Enclosed is the corrected data table for the subject report. The "time of death" was corrected in the table. Please insert in your copy and destroy the old page.


T. G. Grumbles

ajo
.205

Enclosure

VVV 000014898

TO: Keith Fogg, Bill Jones

[Handwritten signature]
PVC

FROM: T. G. Grumbles
DATE: November 25, 1987

VISTA

Interoffice
Communication

SUBJ: VINYL INSTITUTE PROJECT

The Vinyl Institute is working with OSHA to clarify the regulatory status of PVC under the Hazard Communication Standard and the Vinyl Chloride Standard. More specifically, the labeling status or requirements of those standards as it relates to PVC will be clarified. The attached letter describes this project.

We should support this effort by providing summary data for our compounding, dry blend, and other PVC handling operations. At Aberdeen sampling data for blending and compounding operators, dryer operators, and any measurements on loaders should be considered. At OKC, dryer operators and any loader measurements would be applicable.

Please give me a call to discuss the specifics of the data needed.

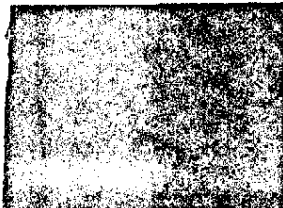
[Handwritten signature]
T. G. Grumbles

ajo
.202

Attachment

cc H. Garrison
J. Friend
W. McClain

VVV 000014899



RECEIVED

LAW OFFICES

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October 30, 1987

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To: SPI Vinyl Institute
Health, Safety and Environment Committee

Re: OSHA Labeling of Vinyl Chloride Polymers
and Copolymers

Ladies and Gentlemen:

This letter is intended to clarify and repeat our September 3 request for existing information concerning worker exposure to vinyl chloride from dry blending, fabrication and transportation dock operations. As a follow-up to our last meeting with the Occupational Health and Safety Administration (OSHA), we need data to support our position that compounding and other polyvinyl chloride (PVC) operations do not result in significant worker exposure to vinyl chloride that would trigger OSHA Hazard Communication Standard requirements. By convincing the OSHA headquarters staff of our position, we should be able to effectively resolve unreasonable OSHA field inspection complaints. The same information may also help us in our longer term efforts to change the labeling language in the OSHA vinyl chloride standard.

Our September 3 letter requested industrial hygiene, worker exposure, and other pertinent sampling data, to indicate the absence of any significant exposure to vinyl chloride for compounding and fabricating workers. We emphasize that our request does not require creation of new information. We

VVV 000014900

SPI Vinyl Institute
Health, Safety and Environment Committee
October 30, 1987
Page Two

request only existing information which is on hand or in detailed summary form. All information submitted will be kept confidential as to its source.

Under the Hazard Communications Standard, employers make a hazard determination. Based on field agent complaints, it appeared that OSHA had made the decision that working with PVC presented a cognizable hazard. The OSHA headquarters staff assures us this is not the case but declined to provide an opinion letter or memorandum without more information. The data we are requesting will substantiate the Institute's claims, educate OSHA, and result in fewer conflicts between facilities and OSHA inspectors on vinyl chloride issues. Furthermore, if the collected data satisfies OSHA's questions regarding the Hazard Communication Standard, this same data may support a change in the vinyl chloride standard.

The Institute cannot continue to interact with OSHA on this matter without supporting data. Therefore, please send these materials to me or to Meredith Scheck at the Vinyl Institute. In advance, we thank you for your assistance. If you have any questions or comments concerning this request for information, please contact us.

Cordially yours,



Peter L. de la Cruz

cc: Charles E. O'Connell
Lewis R. Freeman, Jr.
Robert W. Sherman

VVV 000014901