

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



Reply to the Attention of:

MAR 16 1981

Howard L. Kusnetz, Manager
Safety and Industrial Hygiene
Shell Oil Company
One Shell Plaza
Post Office Box 4320
Houston, Texas 77210

Re: Vinyl chloride, 1980 Candidate List, Comment No. 7-11-1, Docket
No. H-090A

Dear Mr. Kusnetz:

Howard

We are responding to your letter of concern about OSHA placing vinyl
chloride (VC) on its Candidate List.

OSHA did not place VC on its 1980 list of candidate substances for
further scientific evaluation of carcinogenicity, however, VC does
appear on the EPA Carcinogen Assessment Group's list of
carcinogens. As you know, OSHA promulgated a health standard in
1975 based on the carcinogenicity of VC. The purpose of our cancer
standard is to establish which substances found in the occupational
setting are carcinogens and then to regulate in a systematic manner
those substances that would result in an achievement of the greatest
reduction in adverse effects on human health. As indicated in
OSHA's cancer standard, priority assignments will not be based on
health hazard alone, but will be based also on consideration of
population at risk, current employee exposure levels, existing
regulations, existing means of exposure control, nature of the
operation, etc. OSHA will not pursue regulatory activity where
these other factors demonstrate that it is neither necessary nor
appropriate to do so.

Sincerely,

Bailus

Bailus Walker, Jr., Ph.D., M.P.H.
Director
Health Standards Programs

cc: Dr. Peter Infante
Docket Office

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