

Action Program Concerning Vinyl Chloride Standard

The Vinyl Chloride health hazard came to the Department of Labor through a recent public announcement by B.F. Goodrich Co. in mid-January. Since that date we have aggressively addressed the problem by several actions.

A public hearing was held on February 15. The record of this hearing was held open by the Hearing Officer until March 8. OSHA has made a number of visitations to facilities where Vinyl Chloride, Monomer and Polymer, are manufactured. We have gathered all factual statistics available to us. NIOSH has been actively investigating the magnitude of this serious problem.

Based on facts available and judgments of law, an Emergency Standard will be filed in the Federal Register very soon.

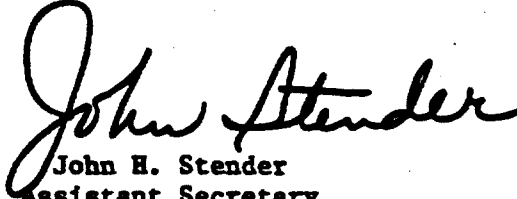
The Emergency Standard will amend our present subpart G, 1910.93 to provide for 50 p.p.m. (currently 500 p.p.m.) as a ceiling for exposure to Vinyl Chloride by employees. It further will provide that employers must regularly monitor work areas. Also, in any area where exposure exceeds the 50 p.p.m., employees must be provided, and must use, fresh-air supplied respirators.

The National Institute for Occupational Safety and Health (NIOSH) has developed a proposed work practices document for Vinyl Chloride. OSHA will file in the Federal Register as a proposed permanent standard for Vinyl Chloride, a proposed rule based on the work practices document proposed for Vinyl Chloride by NIOSH. A final decision, as to a permanent standard, will be made upon conclusion of the rulemaking procedures based upon the record and facts then available.

In conclusion I might add that I once said there would never be another Emergency Standard issued while I was in charge of OSHA. I guess at my age I should never say "never". However, experience with the Emergency Pesticide Standard and the Emergency Carcinogen Standard very definitely created more problems than they resolved. They really did not speed the protection of employees very much. In the case of pesticides, we do not have a work standard yet.

With this experience in mind, I took a "close look" at what was involved in the Vinyl Chloride matter. The 500 p.p.m. now in the standard very definitely is useless to our field compliance efforts. The Maltoni Research Study indicated cancerous tumors in animals came from exposure to 250 p.p.m. of Vinyl Chloride. However, the research indicated that no tumors were found upon exposure to animals at 50 p.p.m.

Fifty p.p.m., as an Emergency Standard, will give our (OSHA) field compliance staff a base from which they can work in this industry to monitor workplace employee exposure. We expect to have our field people begin checking work practices in the entire Vinyl industry almost immediately. We will require detail reports from the field offices to our OSHA-NIOSH team who will be assigned the task, on a full-time basis, of developing the permanent Vinyl Chloride Standard.

A handwritten signature in dark ink, reading "John Stender". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Stender".

John H. Stender
Assistant Secretary
Occupational Safety & Health
Administration

March 22, 1974

cc: Secretary Brennan