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Mr. John R. Lawrence
The Society of the Plastics
Industry, Inc.
355 Lexington Avenue
New York, New York 10017

Re: Employee Training Under OSHA Vinyl Chloride
Standard

Dear John:

The purpose of this letter is to inform you of the recent completion of a case involving the employee training provisions of the Occupational Safety and Health Administration (OSHA) vinyl chloride standard. As you may recall, in September, 1978, an OSHA inspector issued a citation to Hooker Chemical Corporation. The citation noted Hooker's alleged failure to provide training on vinyl chloride for employees who worked in the calendering, compounding and warehouse areas.

Hooker contested the citation for its Burlington, New Jersey facility on the basis that employees working in these areas were not required to be trained on the hazards of vinyl chloride. Both Hooker and OSHA's monitoring of vinyl chloride in the calender and compound facilities indicated concentrations significantly below the 0.5 parts per million (ppm) action level.

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