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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

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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
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