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MEDICAL
DEPARTMENT

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March 21, 1974

President

The Honorable John H. Stender
Assistant Secretary of Labor
U. S. Department of Labor
Washington, D. C. 20210

Subject: RECOMMENDED OCCUPATIONAL HEALTH STANDARD FOR
THE MANUFACTURE OF SYNTHETIC POLYMER FROM
VINYL CHLORIDE - MARCH 11, 1974

My dear Mr. Stender:

Once again I feel compelled to write to you with regard to an action which we understand OSHA may soon promulgate based upon a NIOSH recommended exposure level which we believe to be unwarranted.

In the last instance, relative to the suspected carcinogen list, NIOSH's recommendations involved the untenable guideline of zero exposure. However, your Department did ultimately issue an order establishing reasonable levels, which, while they did create some new costs and problems for us, we felt were proper and justified. I hope that this precedent of reasonableness will be applied to this newly discovered problem associated with vinyl chloride.

If the standards are adopted as recommended by NIOSH, there would be no question that we would have to shut down our vinyl chloride plant at Geismar, Louisiana and our polyvinyl chloride resin plant in Painesville, Ohio. I am fairly certain that the entire industry would be similarly affected. In our own instance we would have to lay off about 550 employees and about 1700 in other Divisions of Uniroyal which are dependent upon polyvinyl chloride. Approximately 100 customers employing many thousands would likewise be shut down. Considering that we produce only about 3% of the domestic consumption of polyvinyl chloride, it is easy to visualize the concurrent effect upon the entire industry and consequent unemployment and loss of revenue.

To the best of our knowledge (we ourselves have had no known or suspected cases of angiosarcoma in 25 years of operation) the several occurrences have been related to lengthy exposures at high concentrations. The only comprehensive animal data released to date ("Maltoni Report" - OSHA Hearing - 2/15/74) showed evidence of toxicity at 250 ppm and higher, but no effect at 50 ppm.

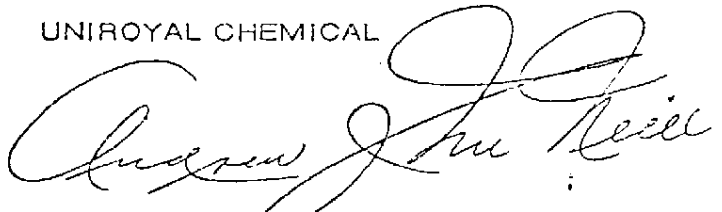
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The combined toxicological evidence suggests no need to set a "less than detectable level" for vinyl chloride in the workplace. Some fixed guideline limit is desirable to assure reasonably safe working conditions. A level of 50 ppm (time-weighted average) appears to be both reasonable and attainable. In addition, all appropriate engineering and design changes should be encouraged to reduce all vinyl chloride exposure to the minimal practical level in all PVC manufacturing facilities.

With such steps we believe that our employees will be properly protected and with minimum economic disruption in a major industry. Again, I would respectfully urge you to insist upon a really objective analysis of the evidence before accepting the NIOSH recommendation.

Sincerely,

UNIROYAL CHEMICAL



Andrew J. McNeill

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