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R. N. WHEELER, JR.

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August 16, 1974

Mr. Julius Jimeno
Occupational Safety and Health Administration
United States Department of Labor
1336 M Street, N.W.
Room 200
Washington, D.C. 20210

Re: Docket - OSH-36

Dear Mr. Jimeno:

I am enclosing three copies of three additional documents which I should like to include in the record of the above docket on vinyl chloride. They are as follows:

1. Paper prepared by Mr. R. N. Wheeler, Jr., Union Carbide's Vinyl Chloride Monomer - Polyvinyl Chloride Manager, which sets forth the difficulties which have been found to exist with the control and recovery of vinyl chloride emissions and which tends to indicate that proposals made in testimony before you already with respect to the ease of such control may be considerably over-rated. This in turn is relevant to your inquiry on the feasibility of control of vinyl chloride monomer.
2. The second document also prepared under the direction of Mr. Wheeler by Mr. W. R. Manning which addresses attention to the difficulties of undertaking new engineering products particularly with reference to the time necessary for completion. This is supported by recent magazine articles showing the waiting time for equipment delivery which also must be taken into account on top of the necessary lead time required for undertaking acceptable improvement projects such as would be required to meet any severely restrictive new vinyl chloride monomer standard. This material, of course, is relevant to the question of engineering feasibility and has not been given sufficient emphasis in the testimony submitted to you to date.
3. This document is an alphabetical list of all employees at Union Carbide's Texas City, Texas plant who have ever been exposed

11/4/74 cc: R. Andrews, UCC, Wayne, JJ

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Mr. Julius Jimeno

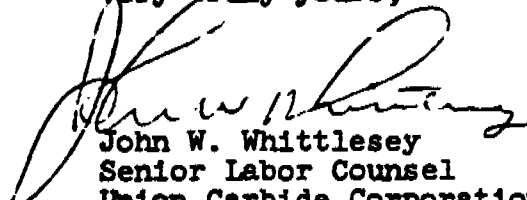
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to vinyl chloride monomer. It lists the date of exposure, the length of time of the exposure, and the total as well as the time weighted average exposure to vinyl chloride. It covers a total of 312 individuals of whom 23 have had over 20 years of exposure, 23 have had 15-20 years of exposure, 34 have had 10-15 years of exposure, 15 have had 5-10 years of exposure and the balance of 182 have had 0-5 years of exposure. The document represents a total of some 2,000 years of exposure at an average rate of 47.5 parts per million. It is a complete listing of these employees. The significance, of course, for this hearing is that not one of those employees regardless of the length of exposure or the concentration, which in some cases average 200 parts per million, have ever had angiosarcoma or any other physical impairment of any sort attributable in any way to exposure to vinyl chloride monomer. The tabulation then supplements the testimony of Dr. Dernehl on behalf of SPI and Mr. R. J. Hughes on behalf of Union Carbide.

These documents in my judgment are of great significance in this matter, indicating as they do the validity of the position urged upon you by industry generally and Union Carbide in particular that no evidence whatever exists to support adoption of the proposed OSHA standard on vinyl chloride monomer exposure.

Very truly yours,


John W. Whittlesey
Senior Labor Counsel
Union Carbide Corporation

Encl sures
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Mr. Julius Jimeno

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August 16, 1974

bcc: Dr. A. B. Steele
Dr. D. H. Glenn
Mr. R. N. Wheeler
Mr. R. E. Grasbert
Dr. E. Q. Hull
Dr. C. U. Dernehl
Mr. D. E. Deese
Mr. R. Bradley
Mr. J. B. Levertton
Mr. R. W. Sesler
Mr. D. L. Engle
Mr. T. W. Carmody
Mr. R. J. Hughes

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