



U.S. DEPT. OF LABOR
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UNIROYAL, Inc.
Clothing Division
17 N.E. Fourth Street
Washington, Indiana 47501
Telephone (812) 254-4290

JUNE 5, 1974

OSHA
DOCKET OSH-36
ROOM 230
1726 M STREET, N. W.
WASHINGTON, D. C. 20210

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URL 06128

GENTLEMEN:

MY SUPPLIERS HAVE INFORMED ME THAT THERE IS A PROPOSED PERMANENT STANDARD ON EMPLOYEE EXPOSURE TO VINYL CHLORIDE MONOMER WHICH, IF MADE EFFECTIVE, WILL PUT THE SUPPLIERS OUT OF BUSINESS.

IF THIS SHOULD HAPPEN, OUR PLANT - LOCATED IN WASHINGTON, INDIANA AND ENGAGED IN THE MANUFACTURE OF PROTECTIVE CLOTHING OF THE TYPE GENERALLY WORN BY PEOPLE WHO MUST WORK IN INCLEMENT WEATHER - WOULD BE SERIOUSLY AFFECTED.

WE CURRENTLY EMPLOY APPROXIMATELY 429 PEOPLE IN THIS COMMUNITY, AND IF WE WERE DENIED AVAILABILITY OF POLYVINYL CHLORIDE, WHICH APPEARS TO BE A POSSIBILITY, APPROXIMATELY 100 OF THESE PEOPLE WOULD BE PUT OUT OF WORK IMMEDIATELY.

HOWEVER, THE PROBLEM IS EVEN DEEPER THAN THAT SINCE IT IS VERY UNCERTAIN THAT THIS PLANT COULD CONTINUE TO SURVIVE AT ALL IF THIS LOSS WERE SUSTAINED.

SINCE I AM A FABRICATOR USING PVC MATERIALS AND NOT A PRODUCER, I HAVE NOT BEEN DIRECTLY INVOLVED IN THE EVENTS LEADING UP TO THIS PRECIPITATE ACTION. HOWEVER, IT IS MY UNDERSTANDING THAT AFTER YEARS OF WORKING WITH NO RESTRICTIONS AT ALL, A TEMPORARY STANDARD OF 50 PARTS PER MILLION WAS INITIATED NOT LONG AGO AND THAT NOW IT IS BEING CONSIDERED TO CHANGE THE TEMPORARY STANDARD TO A PERMANENT ONE AT THE LEVEL OF 0 PARTS PER MILLION, OR, CLOSE TO IT.

I DO NOT WISH TO SEE THE HEALTH OR SAFETY OF ANY PERSON ENDANGERED UNNECESSARILY, BUT I SERIOUSLY QUESTION THE WISDOM OF ACTION WHICH MOVES SO RAPIDLY FROM AN UNCONTROLLED SITUATION TO ONE WHICH DEMANDS THE ABSOLUTE ABSENCE OF THE MATERIAL.

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I THINK THAT THE ECONOMIC WELL-BEING OF THE THOUSANDS OF PEOPLE INVOLVED SHOULD BE VERY CAREFULLY CONSIDERED. FURTHER, WE SHOULD BE ABSOLUTELY SURE THAT A STANDARD SO STRINGENT AS TO PUT SUPPLIERS OUT OF BUSINESS IS ABSOLUTELY NECESSARY BEFORE SUCH A DECISION IS MADE.

SINCERELY,


J. H. HANSON
MANAGER
CLOTHING DIVISION

JHH/HH

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