

J. L. Nelson
W. J. Wilcox

B. F. GOODRICH CHEMICAL COMPANY
Calvert City, Kentucky

DISTRIBUTION D

SPECIAL NOTICE

SUBJECT: Vinyl Chloride Standards

ISSUED: 3-26-74

Last week the Federal Occupational Safety and Health Administration announced temporary emergency health standards for plants involved in the manufacture or use of vinyl chloride. These standards will be published in the Federal Register and will be effective on April 8. In general, they will be the same standards adopted by the Kentucky Occupational Safety and Health Administration a few weeks ago, which applied primarily to polyvinyl chloride plants.

For the most part, we are operating in conformance with what we believe the new standards will specify. The basic parts of the standard call for the use of protective breathing devices when the concentration of VCM exceeds 50 ppm, the use of protective clothing in certain jobs where high exposure might be experienced, and the monitoring of work areas to be sure the exposure is measured. In addition, some basic rules for personal hygiene, such as eating habits, washing, showering, etc., will be included.

We have been monitoring our work areas for some time now with our new organic vapor analyzer (OVA). It shows that our normal atmosphere is well below the 50 ppm. It also shows on certain jobs such as sampling and opening equipment, that we will have to develop new methods and procedures. In the interim, we must use protective respiratory equipment where VCM exposure is possible.

It must be remembered that our OVA monitoring shows total hydrocarbon exposure and further laboratory analyses have shown that in most cases, the major portion is EDC, not vinyl chloride. Our present monitoring system in the EDC Manufacturing and Synthesis area tells us specifically how much of each hydrocarbon is in the atmosphere--our other monitoring does not. It is important in complying with the new regulations that we know the VCM concentration in the atmosphere and our monitoring systems will be so designed.

It is important, also, that our exposure to EDC be minimized as it has in the past; however, the effects of EDC on health are well-known and there has been no evidence that it is as toxic as VCM may prove to be. It is known that exposure to excessive amounts will cause liver problems which abate upon the person's removal from the exposure. This is the reason we have had a strict health monitoring program since the first day EDC was brought into the plant. There has been no evidence to link EDC to any cancer problem in any way.

Our present health monitoring program for all employees is continuing. Some employees who showed some abnormalities in liver function are being re-examined to seek the cause of the abnormalities. At the present time, the doctors reviewing the test results still see no serious implications for any individual.

Hearings will be held by the Federal OSHA in the next two months to establish permanent standards for the handling of VCM. We believe the present temporary standard to represent the best balance at this time of exposure level to health risks. This judgment is based on available data from animal studies and human exposures to more than 50 ppm for extended periods. A standard of "zero exposure" has been proposed. In our view this standard, if adopted, would shut down the PVC industry. Our Company has made this position known to OSHA.

C. L. Woods

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