



General P6-1 (4)
BFG activity: Info packets
B. F. Goodrich Chemical Company

A DIVISION OF THE B. F. GOODRICH COMPANY

6100 OAK TREE BOULEVARD - CLEVELAND, OHIO 44131 - PHONE 216-524-0200

INTERNATIONAL DEPARTMENT

VIA AIR MAIL

October 9, 1974

M.W. Larson

Gentlemen:

This transmittal includes the new OSHA standard for vinyl chloride, number 1910.93q and a Goodrich statement on that standard. Court proceedings have been started by various interested parties, such as SPI and Firestone, in objection to the stringency of the standard.

We expect next, a new FDA regulation pertinent to content of vinyl chloride in any food or drug.

We also expect attention from OSHA to other monomers, and we are considering instrumentation to detect acrylonitrile, butadiene, styrene, etc. Of those materials, acrylonitrile probably will be the first and most important target.

Our Code Zero work will continue under high priority, as we have far to go to achieve levels of VCl required by OSHA.

Sincerely,

J. M. Hyslop
J.M. Hyslop

JMH/kan

cc:R.P. Kenney/A.L. Hatfield/L.M. Puckett/K.H. Lee

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J. M. Hyslop

Managers' Notice
No. 977
October 3, 1974

Subject: GOODRICH STATEMENT ON OSHA STANDARD

The attached news release has been given to the national wire services. Plant managers and sales offices can give it to local newsmen who call requesting information.

No additional statement is to be made beyond this release. Newsmen with additional questions should be referred to The B.F. Goodrich Corporate Communications in Akron.

R. B. Downey
R. B. Downey
Manager, Public Relations
and Advertising
B.F. Goodrich Chemical Co.

Attachment

Distribution:
Cleveland Office
(Plants, Sales Offices
& Technical Centers)

24689002

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THE B.F.GOODRICH COMPANY

Contact: John J. Bell
Phone: (216) 379-3549
500 South Main Street
Akron, Ohio 44318

For Release: Immediately

Subject: GOODRICH STATEMENT ON OSHA STANDARD

AKRON, Oct. 2 -- The B.F. Goodrich Company said today the record of hearings conducted by the Occupational Safety and Health Administration (OSHA) does not support the necessity nor the feasibility of the permanent standard for exposure to vinyl chloride (VC) in the work atmosphere of VC and polyvinyl chloride (PVC) plants.

Goodrich said its comments are based on a preliminary analysis of the permanent standard which was announced Tuesday afternoon by OSHA.

The Company said it intends to continue all plant operations and also seek further reductions in the low levels of VC exposure achieved through intensive efforts over the past several months.

Goodrich said it will do whatever is required to sustain its operations, but the company intends to seek legal review of OSHA's final standard.

OSHA's standard, effective Oct. 4, has three phases. The current exposure limit of 50 parts-per-million (ppm) will continue until Jan. 1, 1975.

Thereafter, the standard will require that VC exposure levels be reduced to one ppm averaged over any eight-hour period and five ppm averaged over any period no longer than 15 minutes.

For higher exposure levels, the standard requires that employers provide certain respiratory devices for employees, but OSHA says the wearing of respirators, until Dec. 31, 1975, "shall be at the discretion of each employee for exposures not in excess of 25 ppm." The use of respirators will be mandatory after Jan. 1, 1976, whenever VC exposure exceeds the allowable levels of one and five ppm.

(more)

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Goodrich said these levels were established arbitrarily and are not supported by the record of OSHA hearings conducted in February and this summer.

Technology to attain these levels does not exist today, Goodrich said. Therefore, the full-time use of respirators by all employees would be required in 1976.

There was ample evidence submitted by industry and other expert witnesses at the OSHA hearings this summer, the company pointed out, on the impracticality of using respirators on this basis.

Goodrich said it has already lowered the average VC exposure levels in its plants from 35-40 ppm early this year to an average of 12-13 ppm. This is acknowledged in OSHA's review of its permanent standard.

The company said it has reached the point where additional improvements come harder and take longer to achieve.

It is not a question of economics, Goodrich said. These efforts have the company's highest priority.

The challenge now, the company's statement continued, is to develop and prove out new technology which, of course, cannot be predicted nor scheduled according to an arbitrary timetable.

Efforts will continue, the company added, to enable Goodrich to meet the steadily growing demand for the numerous applications of PVC, many of which are vital to the national economy.

Goodrich is committed to achieving the lowest practicable exposure levels for vinyl chloride as quickly as this is technologically feasible.