

BFGoodrich

The BFGoodrich Company
Chemical Group
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Cleveland, Ohio 44131
216-524-0200

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PLEASE REFER THIS LETTER TO THE PERSON IN YOUR ORGANIZATION WHO IS RESPONSIBLE FOR ENVIRONMENTAL AFFAIRS.

March 25, 1980

Dear Customer:

In recent years, published reports have suggested that adverse health effects may be associated with PVC dust, though no specific risk to health had been established.

Presently, all PVC dust is classified as a nuisance dust, one that is not thought to produce any irreversible change in living tissue when properly controlled. The Occupational Safety and Health Administration (OSHA) and the American Conference of Governmental Industrial Hygienists (ACGIH) have established a threshold limit value (TLV) for nuisance dust of 15 and 10 mg/m³, respectively, for a total particulates and 5 mg/m³ for respirable dust. These values are based on an eight hour time weighted average (TWA). Concentrations at and approaching this level are easily recognized since visibility in such an environment is significantly restricted.

Respirable dust, that is, dust which is able to reach the lungs, is recognized by health authorities to consist of particles that are 10 microns or smaller in size. Typical particle size for suspension and mass PVC resins is 140 - 150 microns. These represent about 90% of all PVC resin production. Generally, no more than 0.1 percent of these resins will be below 10 microns in size. Dispersion PVC resins, however, typically have an average particle size of less than 10 microns.

To determine the significance of these reports, Imperial Chemical Industries LTD, (a major British PVC manufacturer) sponsored a study of the workers at one of their large PVC plants which has been operating for about 40 years. The study was conducted by a well respected, independent health institute and the results have been made available.

While there is no evidence of a substantial risk to health, the findings do indicate that it is prudent to minimize exposure as much as possible. There was no significant increase in lung damage from the inhalation of PVC dust by non-smokers, but there was a small decrease in breathing capacity due to the combination of PVC dust exposure and cigarette smoking. This decrease was about one seventh of that caused by normal aging and about equal to the loss expected with a one-pack-a-day cigarette smoker. It is generally felt that this effect is the result of relatively higher exposures to dust in past years in contrast to lower exposures in the PVC industry today.

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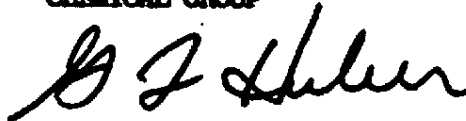
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We believe that the PVC dust levels in our current operations do not present a significant health hazard. Nevertheless, we are expanding the frequency of our PVC dust monitoring to determine whether there are areas where further exposure controls may be prudent.

It is recommended that those engaged in handling and processing PVC resins, particularly resins of respirable size, monitor pertinent areas so as to assure themselves that their plants are responsibly operated.

Sincerely,

THE BFGOODRICH COMPANY
CHEMICAL GROUP

A handwritten signature in dark ink, appearing to read "G. L. Huber", written in a cursive style.

G. L. Huber
General Sales Manager

/vb

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