



RUBBER MANUFACTURERS ASSOCIATION
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June 21, 1974
VC - 5

Corporate Safety Department
JUN 24 1974
Roy N. Johnson

TO: VC/PVC Manufacturers and/or Users

SUBJECT: Impact Data Related to the Proposed Permanent Standard
for Exposure to Vinyl Chloride

Gentlemen:

At a recent meeting with representatives of OSHA's Office of National Programs it was learned that OSHA is attempting to develop a better understanding of the problems that would be encountered by VC/PVC manufacturers and/or users if the proposed standard were adopted.

In order to achieve this better understanding the OSHA representatives prepared a questionnaire (copy enclosed) which would provide the agency with necessary impact data. The OSHA staff realized the problems of confidentiality and the need for clearances within a company. It is totally acceptable by the Office of Standards if you will respond to this questionnaire, return it to the RMA and we will anonymize the information by removing all identities of companies before submitting the information to OSHA.

OSHA would like to have this data by July 9, and we recognize the difficulties you may have in developing this information in such a short time frame. Consequently, you may want to indicate some idea of information which might have been available had there been more time.

You are requested to respond to this questionnaire as well as possible and return it to the undersigned no later than Tuesday, July 9.

Frank T. Ryan
Secretary

FTR:clc
Enclosure

GENC 006894

POINT OF CLARIFICATION - The following point of clarification is included solely for the purpose of aiding your response to these questions. It should not be construed in any way as an official interpretation of the proposed standard by the Department of Labor.

1. Proposed Level of Exposure: "The proposed standard for employee exposure is set at no detectable level, as determined by a sampling and analytical method capable of detecting vinyl chloride at concentrations of 1 ppm with an accuracy of 1 ppm plus or minus 50 percent." (Section 5.A Proposed OSHA Standard) This should be considered a ceiling value, not a time-weighted average.

I. GENERAL DATA

1. How many different manufacturing establishments are involved and what are the processes utilized within each different establishment?
2. What are the common names of the different products identified with each of these processes?
3. What is the average level of exposure of workers to airborne concentrations of VC in these workplaces or in areas of these workplaces?
4. How many total employees are involved in
 - (a) normal operations
 - (b) maintenanceand at what levels of VC?

II. ENGINEERING

1. Estimate the cost of equipment and technology required to feasibly comply with the proposed standard of zero detectability.
2. Specify any information on the availability of necessary technology and equipment required to achieve complete feasible compliance (also include any cost estimates).
3. In terms of engineering alone to what levels could you reduce exposure to VC?

III. PERSONAL PROTECTIVE EQUIPMENT (Both Before and After Engineering Changes)

1. Given present operations, is compliance through use of personal protective equipment feasible?
2. If so, what is your estimated cost of purchasing and maintaining such equipment?
3. Please cite and explain any:
 - A. Data on illnesses and fatalities linked to wearing respirators.

- B. Data on labor/management negotiations with regard to wearing respirators.
- C. Data on the estimated number of people having to wear the protective equipment and the interval of time the equipment would be worn.
- D. Data on the expected frequency of change for the air filters.
- E. Data on the use of air pack versus central air supply.
- F. Cost of implementing and backing up a system of personal protective equipment.

IV. ENVIRONMENTAL AND PERSONAL MONITORING

- 1. What are the estimated costs of purchasing necessary monitoring equipment and having samples analyzed? Do you possess the in-house capability of analyzing the data now?
- 2. What data do you have on the reliability of available testing and analytical methods?
- 3. Estimate the cost of maintaining the monitoring staff and equipment.
- 4. Estimate the cost of initial medical exams and check-ups of employees covered by the standards.
- 5. If there are any previous records on plant and environmental monitoring, what do they show?

V. OTHER DATA

- 1. Identify your target markets for products made from PVC.
- 2. What is the expected impact of compliance on unit production costs?
- 3. Are there any economically viable substitutes for PVC?
- 4. What are the estimated total costs of compliance?

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5. What percent of your projected capital outlays would be attributable to compliance with this regulation?
6. How long will it take to achieve total compliance?
(be as specific as possible)

Provide any data which you feel relevant to substantiate the proposed standard or to support a change in the proposed standard.

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