U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
WASHINGTON, D.C. 20210

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Mr. Raymond H. Schenck
Attorney
Air Products and Chemicals, Inc.
Five Executive Mall
Swedesford Road
Wayne, Pennsylvania 19087

Dear Mr. Schenck:

This is in response to your letter of June 30, 1975 to Assistant Secretary John H. Stender petitioning for the modification of 29 CFR 1910.1017(b)(6), (formerly 29 CFR 1910.93q(b)(6) recodified May 28, 1975), Exposure to Vinyl Chloride, Occupational Safety and Health Standards.

29 CFR 1910.1017(b)(6) defines a fabricated product as being one which is "made wholly or partly from polyvinyl chloride, and which does not require further processing at temperatures, and for times, sufficient to cause mass melting of the polyvinyl chloride resulting in the release of vinyl chloride."

"Release of vinyl chloride" means the release of an amount of vinyl chloride which would likely result in employee exposure at or above the action level without regard to the use of engineering controls. Products which can be classified as fabricated products are exempt from the provisions of the vinyl chloride standard. All other products are subject to the requirements of the standard.

There are no plans presently to formally modify the vinyl chloride standard. Therefore, we hope that the the above clarification of the regulation will satisfy your petition request.

Should you have further questions, please contact me or members of my staff.

Sincerely,

Barry J. White

Barry J. White
Associate Assistant Secretary
For Regional Programs