



UNIROYAL, Inc.
Oxford Management & Research Center
Middletown, Connecticut 06749

July 15, 1974

FILE COPY

Mr. Julius Jimeno
Hearing Management Officer
Occupational Safety & Health Administration
1726 M Street, N.W.
Room 200, U.S. Department of Labor
Washington, D.C. 20210

RE: DOCKET CSH-36
PUBLIC HEARING - PROPOSED STANDARD FOR OCCUPATIONAL
EXPOSURE TO VINYL CHLORIDE - SUBMITTED WRITTEN TESTIMONY
OF UNIROYAL, INC. ON JULY 9, 1974

Dear Mr. Jimeno:

Following the UNIROYAL testimony on July 9 at the vinyl chloride hearing, one of the attorneys questioned me as to the need of a medical surveillance program in a fabricating plant. One of the Medical Directors in the audience subsequently spoke to me. His understanding of what I said was quite different from what I meant to imply. This letter is to correct any error in wording which I may have made. The thought I meant to get across follows:

A good medical program is highly desirable in any industrial operation. However, experience has shown that typical VC exposures in PVC fabricating plants are not more than a very few ppm. It is extremely unlikely that these concentrations would cause an effect which could be detected by medical surveillance. Therefore, liver function or other tests aimed at VC effects would be fruitless and unwise.

Very truly yours,

W D Harris

W. D. Harris, Ph. D.
Corporate Industrial Toxicologist

WDH/mab

URL 06123



UNIROYAL CHEMICAL
Division of UNIROYAL, Inc.
Elm Street
Naugatuck, Connecticut 06770
800-729-1241

July 11, 1974

FILE COPY

Mr. Julius Jimeno
Hearing Management Officer
Occupational Safety and Health Administration
1726 M Street, N.W.
Room 200, U.S. Department of Labor
Washington, D.C. 20210

Re: Docket OSH-36
Public Hearing - Proposed Standard for Occupational
Exposure to Vinyl Chloride - Submitted Written
Testimony of Uniroyal, Inc. on July 9, 1974

Dear Mr. Jimeno:

Would you kindly make the following correction in our written
submittal. On the second from last page (the first page of
the two-page Conclusion) in the third paragraph delete the
phrase "time weighted average" and substitute the word
"ceiling".

Thank you.

Very truly yours,

M. J. Kleinfeld

M. J. Kleinfeld, Director
Commercial Planning

MJK:lads

URL 06124



UNIROYAL, INC.
Route 2, Box 32
Farmville, Virginia 23901

June 18, 1974

The Honorable H. F. Byrd, Jr.
United States Senate
Washington, D.C. 20510

Dear Sir:

Mr. John Stender, Assistant Secretary of Labor, will be conducting an OSHA hearing in Washington, June 25 to June 28, 1974 regarding the exposure of workers to vinyl chloride gas (VC).

Vinyl Chloride gas has been identified as a very hazardous material in that it can cause cancer of the liver. As a result OSHA has issued a temporary standard limiting exposure to 50 parts per million in the air being breathed. OSHA has further announced its intention of issuing a permanent standard in October specifying "no detectable level". The June hearings will provide an opportunity for all interested parties to speak to the proposed standard.

We want you to be aware of the impact a "no detectable level" standard could have on our plant.

In all probability the Poly Vinyl Chloride (PVC) industry would be shut down by such a stringent standard. Poly Vinyl Chloride is the end product of the polymerization of vinyl chloride. If manufacturers of PVC could no longer supply us with this material our plant would be forced to close. We use PVC to manufacture both waterproof and fabric footwear.

Our plant employs two hundred and twenty people in Southside Virginia with an annual payroll of \$1,600,000. Purchase of raw materials, fuel, utilities and taxes add another \$2,200,000 to the economy. These would be lost to the local, state and national communities.

We do not advocate any worker be exposed to a working condition that will affect his health or safety. We do advocate however a logical non-emotional approach to the problem, leading to a solution that will permit our plant continue to operate and provide our employees with jobs.

We respectfully ask that your office bring these points to the attention of Assistant Secretary Stender.

Should you need any further information please do not hesitate to call us.

Sincerely,

A. C. Young
A. C. Young
Factory Manager

URL 06125