

*Gull*

**ALLIED CHEMICAL CORPORATION**

P.O. Box 111, New York, N.Y. 10001

October 28, 1974

Mr. Barry White  
Associate Assistant Secretary  
Department of Labor  
1726 M Street, N.W., Rm. 830  
Washington, DC

Dear Mr. White:

OSHA Standard for Exposure  
to Vinyl Chloride

In reference to the standard proposed in the Federal Register of October 4, 1974 and more specifically, the placarding requirements on page 35898, paragraph five, we have talked to Mr. Wilson and Ms. Ryer of your office on this section.

On the basis of verbal advice from your office, we understand that it will be permissible to print on the label or placard the suggested words, "Cancer-Suspect Agent," providing this does not obscure any of the other information contained on the label or placard.

Thank you for your interpretation and assistance pertaining to this section.

Very truly yours,

*Sanford Schreiber*  
Sanford Schreiber  
Director, Safety and Loss Prevention

SS/jm

bcc: E.W. Callahan  
W.S. Ferguson  
P.E. Keitel

ASI 000010991

drawn from possible contact with vinyl chloride.

(6) Laboratory analyses for all biological specimens included in medical examinations shall be performed in laboratories licensed under 42 CFR Part 74.

(7) If the examining physician determines that alternative medical examinations to those required by paragraph (k)(1) of this section will provide at least equal assurance of detecting medical conditions pertinent to the exposure to vinyl chloride, the employer may accept such alternative examinations as meeting the requirements of paragraph (k)(1) of this section, if the employer obtains a statement from the examining physician setting forth the alternative examinations and the rationale for substitution. This statement shall be available upon request for examination and copying to authorized representatives of the Assistant Secretary and the Director.

(1) **Signs and labels.** (1) Entrances to regulated areas shall be posted with legible signs bearing the legend:

**CANCER-SUSPECT AGENT AREA AUTHORIZED PERSONNEL ONLY**

(2) Areas containing hazardous operations or where an emergency currently exists shall be posted with legible signs bearing the legend:

**CANCER-SUSPECT AGENT IN THIS AREA PROTECTIVE EQUIPMENT REQUIRED AUTHORIZED PERSONNEL ONLY**

(3) Containers of polyvinyl chloride resin waste from reactors or other waste contaminated with vinyl chloride shall be legibly labeled:

Contaminated with  
**VINYL CHLORIDE CANCER-SUSPECT AGENT**

(4) Containers of polyvinyl chloride shall be legibly labeled:

**POLYVINYL CHLORIDE (OR TRADE NAME)**  
Contains  
**VINYL CHLORIDE**  
**VINYL CHLORIDE IS A CANCER-SUSPECT AGENT**

(5) Containers of vinyl chloride shall be legibly labeled either:

(1) **VINYL CHLORIDE**  
**EXTREMELY FLAMMABLE GAS UNDER PRESSURE**  
**CANCER-SUSPECT AGENT**

or (ii) In accordance with 49 CFR Part 173, Subpart H, with the additional legends:

**CANCER-SUSPECT AGENT**  
applied near the label or placard.

(6) No statement shall appear on or near any required sign, label or instruction

which contradicts or detracts from the effect of, any required warning, information or instruction.

(m) **Records.** (1) All records maintained in accordance with this section shall include the name and social security number of each employee where relevant.

(2) Records of required monitoring and measuring, medical records, and authorized personnel rosters, shall be made and shall be available upon request for examination and copying to authorized representatives of the Assistant Secretary and the Director.

(i) Monitoring and measuring records shall:

(A) State the date of such monitoring and measuring and the concentrations determined and identify the instruments and methods used;

(B) Include any additional information necessary to determine individual employee exposures where such exposures are determined by means other than individual monitoring of employees; and

(C) Be maintained for not less than 30 years.

(ii) Authorized personnel rosters shall be maintained for not less than 30 years.

(iii) Medical records shall be maintained for the duration of the employment of each employee plus 20 years, or 30 years, whichever is longer.

(3) In the event that the employer ceases to do business and there is no successor to receive and retain his records for the prescribed period, these records shall be transmitted by registered mail to the Director, and each employee individually notified in writing of this transfer.

(4) Employees or their designated representatives shall be provided access to examine and copy records of required monitoring and measuring.

(5) Former employees shall be provided access to examine and copy required monitoring and measuring records reflecting their own exposures.

(6) Upon written request of any employee, a copy of the medical record of that employee shall be furnished to any physician designated by the employee.

(n) **Reports.** (1) Not later than 1 month after the establishment of a regulated area, the following information shall be reported to the OSHA Area Director. Any changes to such information shall be reported within 15 days.

(i) The address and location of each establishment which has one or more regulated areas; and

(ii) The number of employees in each regulated area during normal operations, including maintenance.

(2) Emergencies, and the facts obtainable at that time, shall be reported within 24 hours to the OSHA Area Director. Upon request of the Area Director, the employer shall submit additional information in writing relevant to the nature and extent of employee exposures and measures taken to prevent future emergencies of similar nature.

(3) Within 10 working days following any monitoring and measuring which discloses that any employee has been exposed, without regard to the use of respirators in excess of the permissible exposure limit, each such employee shall be notified in writing of the results of the exposure measurement and the steps being taken to reduce the exposure to within the permissible exposure limit.

(o) **Effective dates.** (1) Until January 1, 1975, the provisions currently set forth in § 1910.93q of this Part shall apply.

(2) Effective January 1, 1975, the provisions set forth in § 1910.93q of this Part shall apply.

#### APPENDIX A—SUPPLEMENTARY MEDICAL INFORMATION

When required tests under paragraph (k)(1) of this section show abnormalities, the tests should be repeated as soon as practicable, preferably within 3 to 4 weeks. If tests remain abnormal, consideration should be given to withdrawal of the employee from contact with vinyl chloride, while a more comprehensive examination is made.

Additional tests which may be useful:

A. For kidney dysfunction: urine examination for albumin, red blood cells, and exfoliative abnormal cells.

B. Pulmonary system: Forced vital capacity, Forced expiratory volume at 1 second, and chest roentgenogram (posterior-anterior, 14 x 17 inches).

C. Additional serum tests: Lactic acid dehydrogenase, lactic acid dehydrogenase isoenzyme, protein determination, and protein electrophoresis.

D. For a more comprehensive examination on repeated abnormal serum tests: Hepatitis B antigen, and liver scanning.

(Eccs. 6 and 8, 84 Stat. 1596, 1599 (29 U.S.C. 655, 657); Secretary of Labor's Order No. 12-71, 36 FR 8764)

Signed at Washington, D.C., this 1st day of October, 1974.

JOHN STENDER,  
Assistant Secretary of Labor.

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