Vinyl Chloride Developments

On Oct. 4, the Occupational Safety and Health Administration (OSHA) of the U.S. Department of Labor put into effect a permanent standard for vinyl chloride monomer (VCM) exposure in the work atmosphere. We have one facility that produces VCM and five plants that convert it into polyvinyl chloride (PVC) resins for various plastics uses.

The permanent standard has three phases. The first part extends to the end of 1974 the provisions of the emergency temporary standard that have been in effect since April 5. It permits vinyl chloride exposure at 50 parts per one million parts of air (ppm) in plants.

The average level of VC exposure in all Goodrich plants has been reduced to 12-13 ppm from 35-40 ppm earlier this year.

The second phase of the permanent standard is effective January 1, 1975. It establishes allowable levels of one ppm averaged over any eight-hour period and 5 ppm averaged over any 15-minute period. These levels are substantially lower than any known to exist in any VCM or PVC plant anywhere in the world.

The 1975 and 1976 rules are the same with one significant difference. In 1975, OSHA says the use of respirators by employees whenever VCM exposure exceeds one and five ppm "shall be at the discretion of each employee for exposure not in excess of 25 ppm." Respirators shall be made available for all employees who want them.

In 1976, the use of respirators by employees is mandated whenever exposure exceeds the allowable limits of one and five ppm. Employees would also be required to wear different types of respirators at various levels of exposure above one and five ppm.

Our first concern is protecting employees against the degree of risk that is known to exist. Through intensive company efforts and with the help of our employees, VCM exposure in Goodrich plants is many times lower today than it used to be.

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Actual experience in the industry shows that low-level exposure to VCM over many years has not caused health problems. There is no documentation to the contrary. Nevertheless, we are continuing our efforts to reduce VCM exposure in our plants as quickly as this is technologically feasible. However, we are at the point where further improvements come harder and take longer to achieve.

The technology to meet the future exposure levels specified by OSHA does not exist today. This was confirmed in an engineering study commissioned by OSHA as part of its fact finding into the matter.

Therefore, we believe the permanent standard is arbitrary. OSHA, in announcing the permanent standard on Oct. 1, said the agency had "a comprehensive record on which to base its final ruling." Yet, OSHA made the following statement in its comments attached to the permanent standard: "

We believe this is a serious inconsistency and we have filed a petition for review of the entire matter.

Compliance with the permanent standard, especially in 1976, would require the full-time use of respirators by all employees on the job. This is impractical, as various experts testified at OSHA's hearings this summer.

B.F.Goodrich is working on new plant technology and also investigating various types of respirators that might be used, including possible new equipment developments in respiratory technology. We believe improvements can and will be made in time, but technological discoveries cannot be scheduled according to an arbitrary timetable nor to meet the exposure levels that OSHA has picked. We believe reconsideration of the permanent standard is required on the basis of the record.

Nevertheless, we will continue to make every effort to safeguard the health of our employees in continuing our operations.

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