

ASD OSHA STD 77
The Goodyear Tire & Rubber Company

RN Wheeler
for your files

AKRON, Ohio 44316

FILE COPY

March 19 1975

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MAY 27 1975

R. N. WHEELER, JR.

Dear Customer:

Barring future court action, OSHA regulation 1910.93q pertaining to vinyl chloride will take effect on April 1, 1975. Goodyear's plans for continued production of general purpose resins, dispersion resins, and compounds have not been contingent on a favorable ruling by the court on the petitions for review of the OSHA standard. We intend to maintain production under the new standard at our PVC plants with the use of respiratory equipment.

The company has already made numerous improvements in equipment, processes, and work practices, including the use of respirators as required. In addition, we are continuing intensive research and development programs on new and improved technology. These programs already are providing promising results which are now undergoing further evaluation and in-plant testing. In further compliance with the standard, we have in-place alarm systems which signal any leak above 10 ppm, and are installing alarms for even lower levels.

The company's current product line includes mass polymerized general purpose resin from our Plaquemine, Louisiana plant and dispersion resin and compounds produced at Niagara Falls, New York. Long term plans include further expansion of the Plaquemine plant and replacement of that portion of our Niagara Falls production facility previously closed down because of the OSHA regulation.

The regulations require precautionary labeling of containers of resins and compounds shipped after or in transit on April 1, 1975. The regulation states:

"Containers of polyvinyl chloride shall be legibly labeled:

Polyvinyl Chloride (or Trade Name)

Contains Vinyl Chloride

Vinyl Chloride is a Cancer Suspect Agent"

In the case of Pliovic PVC resins and compounds, the label will appear:

PLIOVIC
CONTAINS VINYL CHLORIDE
VINYL CHLORIDE IS A
CANCER-SUSPECT AGENT

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In the case of Pliotuf rubber/vinyl blend compounds, the label will appear:

PLIOTUF
CONTAINS VINYL CHLORIDE
VINYL CHLORIDE IS A
CANCER-SUSPECT AGENT

A precautionary statement on pre-printed 3" x 5" wire tags with the above type will be used at the entries to bulk hopper trucks, box cars, and truck trailers.

Bulk rail cars used for transporting Pliovic polyvinyl chloride will be stenciled at both ends close to the access ladders with the OSHA precautionary statement above in 3/4" letters. All top hatches will be stenciled in 1/2" letters with the following:

Enter with Adequate Ventilation
Respiratory Protection Recommended

Goodyear has continuing and on-going programs for reducing the residual vinyl chloride monomer levels in its products. Current levels measured in the resins being manufactured in our Niagara Falls plant are as follows:

"AO/WO" resins:	10 ppm maximum with typical levels being non-detectable
"M" resins:	50 ppm maximum with typical levels < 30 ppm
Compounds:	5 ppm maximum with typical levels being non-detectable

The above values were determined just prior to movement of the finished resins into our warehouse for storage. These values should be considered maximum since vinyl chloride is migratory.

At the Plaquemine plant, resin being produced in our recent expansion is generally measured under 100 ppm with typical levels of 60 ppm. New equipment being delivered and installed during the second quarter of this year will assist us in reducing VCM levels in resin produced in the older section of this plant, and will help us in reaching a goal of less than 10 ppm residual monomer in all Plaquemine produced materials.

The company is hopeful that these continuing programs will permit still further reductions of monomer levels in its products. As further progress is made or significant developments occur, we will continue to keep you informed.

Very truly yours,

Robert H. Williams
CHEMICAL DIVISION
Marketing Manager
Plastics Department

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