

MAR 14 '85 09:45 UNIROYAL MIDDLEBURY
Teletype to R.M. Hall - Painesville

Please convey comments to me
at Q. 4421 by close of
business 3/14/85.
S/H Shumway

March 13, 1985

The Honorable Howard M. Metzenbaum
United States Senate
Committee on Labor and Human Resources
Washington, D.C. 20510

Dear Senator Metzenbaum:

Your letter of March 1, 1985 to Joseph P. Flannery, requesting information as to what measures Uniroyal, Inc. has taken to make employees at our Painesville, Ohio plant aware of potential health hazards has been referred to me for response. Please be advised that Uniroyal has an on-going program of long standing to address the concerns raised in your letter, as more fully discussed below.

The National Institute of Occupational Safety and Health (NIOSH) study of the Painesville plant referenced in your letter specifically refers to vinyl chloride. As background, we wish to note that production of vinyl chloride monomer at that plant was discontinued in 1961, and the use of vinyl chloride monomer for polyvinyl chloride (PVC) production at Painesville ceased in January 1976. Despite our exit from PVC manufacture, Uniroyal has continued to support and supply information to the Chemical Manufacturers' Association in its ongoing vinyl chloride mortality study.

Uniroyal has had an extensive health monitoring and medical surveillance program in place at the Painesville plant since 1974. This program includes an annual physical examination (made available to all employees), which includes comprehensive blood analysis, hemocult blood tests, pulmonary function test, chest x-ray, and actual hands-on physical exams. A personnel monitoring program wherein employees wear a gas badge or its equivalent to automatically monitor their exposure was initiated in 1974. Results of this monitoring are recorded and maintained. Additionally, a computer controlled on-line area monitoring system has been in place since 1976.

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PROTECTIVE ORDER

3/14/85
 Called Susan
 and recommended
 adding "to all employees
 online 5 as shown. P03

When the Emergency Temporary Standard (ETS) for vinyl chloride was issued in 1974, all present and former employees of the Painesville plant were formally notified by letter of the concerns relating to vinyl chloride exposure. A similar notification was provided in 1978, when an ETS for acrylonitrile was issued. Present and former employees of the Painesville plant are very aware of the potential effects of exposure to vinyl chloride and acrylonitrile in the work place.

need to
 confirm
 unable to
 find that we
 notified
 employees.

We also wish to note that a mortality experience study published in May 1979 by the University of North Carolina indicated that the Painesville plant has a better health profile than the general population in the United States and the State of Ohio. No statistically discernable excesses were noted.

In our estimation, our existing efforts meet, and even exceed, all applicable state and federal requirements, including the requirement for annual employee orientation and training relating to the chemicals in use at Painesville. There is also an active joint program with our union, Local #553 of the United Rubber Workers, regarding health and safety concerns.

Uniroyal trusts that this information adequately responds to your inquiry. We believe that our efforts at Painesville demonstrate fully Uniroyal's commitment to the health and safety of our employees. All past and present employees have been and will continue to be advised as to the potential effects of exposure to vinyl chloride and acrylonitrile, and their current exposure levels, if any, through an active on-going program that exceeds applicable federal and state requirements. We will continue to attempt to develop methods to further reduce exposure to acrylonitrile.

Uniroyal is proud of its programs and achievements in this area. We would be happy to have you visit our Painesville plant to observe first hand what we are doing to protect the health and safety of our employees. If you wish to visit, please call us at (203)573-2153 to arrange a convenient time.

Very truly yours,

B. R. Leach

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 PROTECTIVE ORDER