

B. F. Goodrich Chemical Company

A DIVISION OF THE B. F. GOODRICH COMPANY

8100 OAK TREE BOULEVARD - CLEVELAND, OHIO 44131 - PHONE 216-524-0200

ANTON VITTONI
DIVISION PRESIDENT

July 16, 1974

Mr. David R. Bell
Office of Standards Development
Room 500
1726 M Street N. W.
Washington, D. C. 20210

Dear Mr. Bell:

Pursuant to the Memorandum dated June 17, 1974 from John H. Stender, Assistant Secretary of Labor, we have the following comments regarding the Draft Environmental Impact Statement (DEIS) on Proposed Regulation - Vinyl Chloride.

DEIS is a commendable effort by a number of people to educate themselves quickly to a very complex problem through readily available publications and a walk through survey of seven plants located in the Southern part of the United States.

The conclusions drawn from such an effort by both the survey group in Appendix C and the authors of the DEIS applied to the 15 monomer plants (mostly Southern and open locations) and the 36 polymer plants (mostly Northern and closed locations) seem to be unsupported.

We note a number of inaccuracies in reporting published information, but, since we understand the DEIS will be redone taking into consideration all information presented at the recent hearing, we will comment on only a few errors.

It appears that the DEIS is based on certain assumptions which are not supported by fact, namely:

1. That the proposed permanent standard for a non-detectable level of exposure to VCM means exposure to a ceiling level of 1 ppm.
2. That it is technically feasible by engineering changes to operate VCM and PVC plants under a 1 ppm ceiling standard and that, while such engineering changes are being made, it is feasible to operate with workers in self contained air supplied masks and whole-body air supplied suits.

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The possibility of engineering or re-engineering to meet the proposed standard is discussed on page 62. There is no data offered to support technological feasibility, except to say that "costs could be very substantial". Also, there is recognition that the use of "required personal protective equipment may reduce the productivity of a worker through reduced mobility", but again, no comment as to the discomfort and health and safety hazards to the individual through such use.

OSHA Industrial Hygienists conducted an on-site survey in March, 1974 (Appendix C) of five vinyl chloride manufacturing facilities and two PVC plants in the Baton Rouge-New Orleans area. From this survey, the following conclusions were drawn:

- "2. The PVC manufacturers have a more serious problem of VCM exposure than the VCM producers because most of the polymerization process equipment is in enclosed areas and ventilation is inadequate.
- "3. Leaks from the process equipment, vessel entry, VCM tank car loading, unloading, and process sampling, PVC reactor cleaning, compounding and packaging areas are major potential sources of VCM exposure found during this survey.
- "4. Engineering technology for control of VCM exposure is available and has been implemented by industry.
- "5. The observed practices relative to equipment maintenance, monitoring, medical examinations and surveillance and training are considered to be inadequate to control the employee's exposure to VCM."

In contradiction to these conclusions, the DEIS (page 63) states: "Since the technology appears to be readily available, it can be assured that substantial development costs will not be incurred."

Even the meager data quoted on the two of seven plants visited (both obviously VCM manufacturing facilities) disclosed only one ceiling value below 1 ppm. Plant A data reported was on a Time Weighted Average basis (not recognized in the proposed standard), and all showed detectable exposure levels.

This data certainly cannot be used to support the feasibility of the proposed permanent standard. In addition, this data shows significant exposure above the present emergency standard (several readings in excess of 150 ppm).

The DEIS (page 63) mentions several possible areas of improvement which would lead to lower exposure levels. While we recognize that these suggestions may, where they are not now being effectively implemented, reduce exposure, we know of no way to reduce exposure to 1 ppm or non-detectable level. Moreover, we know of no other PVC or VC plant which is operating or can operate within the proposed permanent standard.

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In summary, there are no data in Appendix C that could logically lead to the conclusion that a ceiling of 1 ppm is feasible in work areas of existing facilities even with engineering modifications.

Therefore, we find that there is absolutely no substantial basis, either in the DEIS or in fact, for the statement on page 63:

"No evidence to date indicates that promulgation of the proposed standard will stop vinyl chloride production and use, although production in some plants could be curtailed if re-engineering is required."

To the contrary - the evidence reinforces the industry position that it cannot now, nor in the foreseeable future, comply with a work area ceiling level of 1 ppm VCM in either its VCM or PVC manufacturing facilities.

Cartridge respirators are summarily dismissed (page 56) without provision for future improvement or recognition of their effectiveness under appropriate operating conditions. There is no recognition of the personal problems involved in wearing "full face respirators", nor "whole-body air supplied suits impervious to vinyl chloride".

The statement supports the inclusion (page 58) of a specific protocol for testing, medical diagnosis and treatment for a newly identified disease for which there is no known predictive testing.

There are a number of technical inaccuracies. For example:

1. Production of vinyl chloride Table 1 page 26

Shell's testimony at the February 15, 1974 hearings is referenced as a source of their vinyl chloride monomer capacity. The reported figures of 1,200 and 1,000 millions of pounds (per year?) are actually stated in the testimony as 1200 and 1000 tons per day, respectively, for their two plants. This may explain why, on page 28, the authors were puzzled by the apparent discrepancy in the number of workers reported by PPG and Shell required -- "per million tons" -- (of what time?).

2. Production of vinyl chloride polymer and copolymer resins amongst others, page 35

"The output of bulk processing plants is said to be more than twice that of good suspension plants of comparable size". Typically, such statements are repeatedly made without specific reference in the statement. We do not believe this statement to be accurate.

On page 60, the DEIS states that "vinyl chloride, a petrochemical, is produced from irreplaceable natural resources, and reduced demand on these resources could be of merit".

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Are OSHA and other Governmental agencies cognizant that over 50% of vinyl chloride (and PVC) is derived from salt, of which the world has a superabundance. Likewise, ten percent of the chlorine produced in the United States is used to make PVC and a reduction of caustic production would have a significant environmental impact.

In summary, in our judgment, the proposed permanent standard is not technically feasible and the DEIS provides no evidence to the contrary.

Yours very truly,

B.F.GOODRICH CHEMICAL COMPANY
a Division of The B.F.Goodrich Company

Anton Vittone
Division President

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