

THE GENERAL TIRE & RUBBER COMPANY

Comments on the Department of Labor, OSHA

Proposed Permanent Standard on Vinyl Chloride

29 CFR 1910.93q

THE GENERAL TIRE & RUBBER COMPANY

The General Tire & Rubber Company is a producer of polyvinyl chloride resins as well as a major manufacturer of fabricated products made from polyvinyl chloride. We employ 135 people at our polyvinyl chloride manufacturing facility in Ashtabula, Ohio, and 6,000 people in twelve (12) fabricating plants located throughout the United States. We are vitally concerned with the proposed permanent standard on vinyl chloride exposure (29 CFR §1910.93q) and submit the following comments for consideration.

Permissible Exposure:

Industry, labor and government share a common concern of preserving and protecting the physical well-being of all those exposed to vinyl chloride while at the same time keeping the polyvinyl chloride industry a viable segment of the economy. The proposed permanent standard calling for an exposure standard of no detectable level does not meet this goal nor is it feasible within present technology. Accordingly, The General Tire & Rubber Company objects to an exposure standard of no detectable level.

The exposure level to vinyl chloride must be kept in perspective. After reviewing the scientific and medical data available, the Occupational Safety and Health Administration stated in the background to the emergency temporary standard:

"Accordingly, there is insufficient evidence at this time to conclude that vinyl chloride at concentrations of 50 parts per million or below poses a grave danger to humans."

The only new exposure level data set forth in the introductory material to the proposed permanent standard is the preliminary report from Industrial Bio-Test Laboratories wherein 2 of 200 mice exposed to 50 parts per million concentrations of vinyl chloride seven hours per day, five days per week for approximately seven months developed angiosarcoma. Thus, on the basis of 2 mice, and without any correlation to human experience, it is now proposed that the permissible exposure to vinyl chloride be dropped from 50 parts per million to no detectable level without regard to technical feasibility, sociological or economic ramifications. Such a course of action has no basis in science or fact as recognized in the permanent standard wherein it is stated:

"... the question of a safe level of exposure for humans cannot be determined at this time, and may continue as a matter for scientific deliberation for many years."

The General Tire & Rubber Company would, in the interests of every reasonable and feasible precaution, support a permissible exposure level standard consisting of a time weighted average of 25 parts per million and a ceiling level of 40 parts per million. These levels are technologically feasible, and scientifically and medically reasonable based upon present data and technology. It should be further noted that we submit and support these levels without regard to cost in achieving the same.

In addition, The General Tire & Rubber Company is dedicated to the eventual elimination of exposure to vinyl chloride in the production of polyvinyl chloride resins, and to the elimination

of residual vinyl chloride monomer in polyvinyl chloride resins. While these goals are not yet possible or feasible within the limits of present technology, we have taken steps which have resulted in dramatic reductions of vinyl chloride exposure in our polymer plant and residual levels of vinyl chloride in our polyvinyl chloride resins. We are confident that our efforts will continue to bring positive results, and with regard to polyvinyl chloride resins, that we will achieve production of such resins virtually free of residual vinyl chloride.

We urge the adoption and endorsement of a time weighted average approach because mere ceiling levels alone are meaningless. The crux of exposure levels is - what concentration over what period of time - and this can only be dealt with by the time weighted average principle.

Scope and Definitions:

There appears to be a conflict between 1910q(a)(1) and 1910(d) in that (d)(11) uses the word "capable" whereas 1910(a)(1) does not. We suggest the deletion of the word "capable" from 1910(d) can be made without adversely affecting the standard.

The term "released" is found throughout the standard, and we find such term ambiguous. The standard is concerned with levels of exposure to vinyl chloride in the atmosphere and should be so stated thereby deleting the use of the word "released."

If, in the polyvinyl chloride manufacturing plants a no detectable level of vinyl chloride is technologically impossible at present, which we submit is the case, then 1910.93q(b)(8) "Emergency" must be redrafted. As written, there would be an

"emergency" 24 hours per day. "Emergency" should be limited to those few extraordinary situations which might give rise to a risk of exposure to unusually high levels of vinyl chloride.

Monitoring:

We support a system of combined area and personal monitoring. For area monitoring, we recommend a sequential fixed automatic system, which would trigger alarms at 25 parts per million and again at 40 parts per million. The first alarm would alert personnel of elevating levels of vinyl chloride and allow time for corrective measures to be taken. The second alarm would, of course, be the signal to don respiratory equipment. For personal monitoring, it is our opinion that carbon charcoal tubes be utilized until a better method is developed.

Respiratory Protection:

With regard to respirators, we submit that at the low levels of exposure contemplated that self-contained canister type respirators would be adequate and feasible. We would, however, support the use of fresh air respirators of the type set forth in 1910.93q(3) during the process of loading or unloading vinyl chloride monomer, and in other extraordinary situations where exposure to high levels of vinyl chloride might reasonably be contemplated.

Labeling:

§1910.93(k)(2) should be changed to reflect the permissible use of self-contained canister type respirators.

We support the labeling of containers as set forth in 1910.93(k)(4) only where residual vinyl chloride is in excess of 0.1%. This would be consistent with known carcinogen labeling requirements and is reasonable.

Maintenance and Decontamination:

§1910.93(1)(4) as proposed is neither necessary nor feasible. For vessel entry we support the use of impervious clothing such as a rain slicker type suit, fresh air respiratory equipment, boots, gloves and headcovering. This combined with engineering controls and workpractices to provide for purging and venting the vessel prior to entry will provide more than satisfactory against vinyl chloride exposure.

There should be a distinction drawn between vessel entry and normal maintenance and repair operations. Many normal repair and maintenance operations do not involve the danger of exposure to excessive levels of vinyl chloride, and these operations could be conducted safely with self-contained canister type respirators and normal protective clothing. Only such operations as involve an extraordinary risk of exposure to high levels of vinyl chloride should require the use of fresh air respirators and impervious clothing.

Record Keeping:

The record keeping requirements proposed are unduly burdensome, and counterproductive. If for every excursion above the permitted exposure level no matter how slight or of limited

duration a notification to the Occupational Safety and Health Administration and detailed written report is necessary there could be several per day per plant being submitted. Data of this type would be virtually meaningless. We would suggest a quarterly form be submitted which would present exposure data for that quarter in an orderly and compiled fashion.

1910q(3) should provide time for the compilation of data inasmuch as such compilation will be necessary to determine if the permissible levels have been exceeded.

Fabrication Operations:

Our testing data indicates that there is, at worst, only minimal exposure to vinyl chloride in fabricating plants. In fact, our evidence would indicate that in the operative breathing zone exposures to vinyl chloride are running zero to 10 parts per million. These minimal levels are presently being reduced even further through the use of resins lower in residual vinyl chloride, and by increased ventilation. These steps to further reduce vinyl chloride exposure, especially the reduction of residual vinyl chloride in the resin, are the key to solving any problems in the fabricating plants and are feasible and technologically possible. Accordingly, we submit that at this time there is no need for a standard covering polyvinyl chloride fabricating plants.

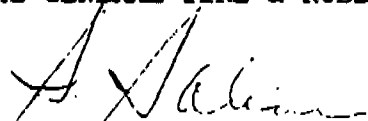
The General Tire & Rubber Company suggests that while a detailed standard is not necessary at this time that there should be some monitoring for vinyl chloride within fabricating plants,

and if any such monitoring discloses vinyl chloride exposure levels above those suggested for the permanent standard, that immediate notification be given to the Occupational Safety and Health Administration and corrective action taken. In addition, the Occupational Safety and Health Administration should receive regular reports of the results of the monitoring in the fabricating plants.

If however, it is determined that there should be some regulation of vinyl chloride exposure in the fabricating plants, then we submit that such regulation should be in the form of a standard limited solely to fabricating plants. Feasibility, economics, logistics and the vast number of people and plants involved coupled with minimal exposures dictate a conclusion that the very detailed standard applicable to monomer and polyvinyl chloride resin manufacture is not suitable, necessary or advisable for application to fabricating plants.

Respectfully submitted,

THE GENERAL TIRE & RUBBER COMPANY



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