



Public Affairs Bulletin

Public Affairs Committee
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WRAP-UP OF THE OSHA HEARINGS ON VCM

As promised, here is a summary of the second week of OSHA hearings on the subject of Vinyl Chloride Monomer. As in the past, this issue will contain a direct copy of a news release on the subject (beginning on the next page).

OUR NEW LOOK

This is the first issue of the Public Affairs Bulletin to use our newly designed letterhead. It is our intent to set these public affairs communiques apart from the rest of your mail and make it easier for you to identify. We hope you like it.

REMINDER TO PROCESSORS

Until OSHA issues their new permanent standard, you are obliged to comply with their emergency temporary standard which went into effect last April 5th.

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SUMMARY OF SECOND WEEK OF OSHA HEARINGS ON VINYL CHLORIDE

July 8

The B.F. Goodrich Chemical Company was the lead-off witness for the second week of hearings. In its testimony, Goodrich stated that a no-detectable level is technologically infeasible, and that it is not safe to require employees to wear respiratory protection for full eight-hour work shifts.

According to John L. Nelson, Vice President Manufacturing, "peak exposure levels ten and twenty years ago were 100 times today's emergency standard, and probably averaged forty times today's average levels." This year, average exposure levels in Goodrich plants have been reduced from about 35-40 ppm to about 12-14, with some excursions over 50.

Nelson also said that construction of a new PVC facility at the Louisville plant will begin about mid-1975. Preliminary engineering work on the new plant was started in 1972.

Dr. Condict Moore, Director of the Cancer Center, University of Louisville School of Medicine, reported on a new three-part research program being sponsored by Goodrich to investigate the health effects of vinyl chloride.

In other testimony, Johns-Manville, the nation's largest manufacturer of PVC pipe, asked OSHA to exempt manufacturers of PVC pipe and pipe fittings from the proposed standards, or, as an alternative, to develop a separate standard for the pipe industry. J-M submitted the draft of a proposed alternative standard with its comments.

The Armstrong Cork Company requested OSHA to exempt from coverage under the standards any manufacturer using PVC resin containing less than 0.2 percent uncombined monomer.

July 9

The International Association of Machinists and Aerospace Workers supported the proposed standard, and warned that the VCM situation is creating a psychological problem among long-term workers, who are worried about what may be happening to them as a result of their past exposure.

Anthony Mazzocchi of the Oil, Chemical and Atomic Workers International Union questioned industry claims as to the technical infeasibility of the proposed standard and urged that fabricators be included in the coverage.

Goodyear recommended the establishment of separate standards for the producers of VC monomer, the producers of PVC resin, and for fabricators. In its testimony, Goodyear said that it "fails to see how OSHA can scientifically conclude that exposure to vinyl chloride at concentrations of 50 ppm can constitute a serious health hazard to humans."

The American Chemical Society endorsed the proposed "no detectable" standard because of the lack of available data establishing a safe level of exposure to vinyl chloride, but recommended periodic review of the standard in light of new data. The Society provided no details as to the scientific basis for its recommendation, but indicated that it relied heavily on advice from the National Institute for Occupational Safety and Health, which made the original "no detectable level" recommendation to OSHA earlier this year. In cross examination, VCM and PVC company representatives, themselves members of ACS, were sharply critical of the claim that the ACS position was truly representative of its membership's opinion, since no one from the vinyl industry, as far as could be determined, had been consulted.

Representatives from the Health Research Group also supported the proposed standard.

July 10

The Firestone Plastics Company was the principal witness of the day. Its president, Todd C. Walker, supported an exposure level of 25 ppm Time Weighted Average (TWA) coupled with a 40 ppm ceiling, but disagreed with SPI's recommendation of stepped reductions over the next two years.

"This exposure level should be maintained as the permanent standard until further ongoing medical experimentation and study -- of the human as well as animal experience -- is completed and more definitive conclusions have been reached concerning the nature and consequences vinyl chloride may have on industry employees," he said.

Firestone, who had retained an independent organization to conduct an extensive feasibility study based on known technology, estimated that it might cost as much as \$20 million for it to meet the 25 ppm TWA and 40 ppm ceiling which it recommended.

A number of PVC processors and fabricators testified that if a "no detectable level" standard forced a shutdown of the PVC resin industry, they too would be forced out of business.

July 11

On the final day of the hearings, the Calgon Corporation described laboratory experiments showing that vinyl chloride can be totally removed from air by filtering it through beds of activated carbon. Calgon is a major manufacturer of activated carbon.

Under questioning, Calgon admitted that the installation costs of such a system would be quite high, and that the system would be most useful in limiting VCM emissions to the ambient air, but that it would have a minimal effect on worker exposure.

At the close of the hearings, presiding Administrative Law Judge Gordon Myatt fixed August 23 as the final day for submission of post-hearing comments and exhibits. He also announced that the Foster D. Snell Company has been retained by OSHA to conduct a technological and economic feasibility study to determine the effect on the vinyl chloride industry if the final standard were set at a level greater than zero. Various levels of exposure will be used by Snell in their study, the results of which will be made available to the public for comment.

In an impromptu post-hearing press conference, Daniel P. Boyd, Director of the OSHA Office of Standards Development, said the final standard would not be so tough as to force a shutdown of the vinyl chloride industry. He indicated that the standard would be "somewhere between zero and 25 ppm."

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