STATEMENT OF VINYL CHLORIDE RESEARCH PROGRAM
ADMINISTERED BY
THE MANUFACTURING CHEMISTS ASSOCIATION

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MANAGEMENT REPRESENTATIVES OF THE GROUP OF VINYL CHLORIDE AND POLYVINYL CHLORIDE PRODUCERS INVOLVED IN THE VINYL CHLORIDE RESEARCH PROGRAM ADMINISTERED BY THE MANUFACTURING CHEMISTS ASSOCIATION HAVE REVIEWED THE PROPOSAL BY NIOSH DATED MARCH 11, 1974, TITLED "RECOMMENDED OCCUPATIONAL HEALTH STANDARD FOR THE MANUFACTURE OF SYNTHETIC POLYMERS FROM VINYL CHLORIDE". ADOPTION AND IMPLEMENTATION OF THESE STANDARDS AS PROPOSED WOULD FORCE AN IMMEDIATE CESSATION OF PVC PRODUCTION NATION-WIDE. WE FEEL THAT BOTH THE REQUIREMENT TO COMPLETELY DECONTAMINATE AIR EXHAUSTED TO THE EXTERNAL ENVIRONMENT AND THE REQUIRED MAINTENANCE OF NON-DETECTABLE LEVELS OF VINYL CHLORIDE WITHIN REGULATED OPERATING AREAS ARE GROSSLY UNREASONABLE AND CANNOT BE ACCOMPLISHED. NEITHER TECHNOLOGY NOR ENGINEERING OR CONTROL METHODS TO ACHIEVE THESE RESULTS ARE KNOWN. OTHER ASPECTS OF THE PROPOSAL ARE SIMILARLY RESTRICTIVE AND IMPOSE ADDITIONAL BURDENS ON THE SAFETY AND OPERATING CAPABILITIES OF EMPLOYEES.

IN VIEW OF THE RECENT SERIOUS CONCERN REGARDING CANCER CAUSATION, THE INDUSTRY IS, AND HAS BEEN, CARRYING OUT PROGRAMS THAT ARE SIGNIFICANTLY REDUCING EMPLOYEE EXPOSURE AND, MORE SPECIFICALLY, ASSESSING EMPLOYEE HEALTH STATUS AND EXPERIENCE. IT IS BELIEVED THAT A STANDARD OF 50 PPM TWA INDIVIDUAL EXPOSURE CAN BE ACHIEVED, MAINTAINED, AND PERHAPS BETTERED WITH AVAILABLE TECHNOLOGY IN EXISTING PLANTS BY MEANS OF :

(A) IMPROVED LEAK DETECTION AND CORRECTION
(B) VENTILATION IMPROVEMENT
(C) WORK PRACTICE IMPROVEMENT
(D) EQUIPMENT MODIFICATION
(E) PROCESS IMPROVEMENT

REALIZATION OF THIS LEVEL SHOULD PRECLUDE THE NECESSITY FOR CONTINUOUS USE OF AIR SUPPLIED RESPIRATORY EQUIPMENT PROPOSED BY NIOSH. IMPOSITION OF A "SPACE SUIT" TYPE APPROACH ON LARGE POPULATIONS OF EMPLOYEES IN THE PRODUCTION OF VINYL CHLORIDE PVC, AND PVC FABRICATED PRODUCTS INTRODUCES NEW SAFETY AND OPERATIONAL RISKS WHICH HAVE NOT BEEN ASSESSED AND SHOULD NOT BE REQUIRED.

WE BELIEVE THAT THERE IS NO NECESSITY TO IMPOSE EXPOSURE REGULATIONS OF THE SEVERITY PROPOSED BY NIOSH. THE MEDICAL AND TOXICOLOGIC EVIDENCE AVAILABLE TO DATE SUGGUST THAT 50 PPM EIGHT HOUR TIME WEIGHED AVERAGE EXPOSURE LEVEL TO VCM IS A PRUDENT WORKING LEVEL. THIS IS BASED ON SUBSTANTIAL ANIMAL TOXICOLOGICAL WORK AND HUMAN EXPERIENCE. THE ANIMAL EXPOSURE STUDIES OF MALTONI AND TORKELSON SHOWED NO EFFECT AT 50 PPM LEVEL. DOW CHEMICAL COMPANY HAS PRESENTED STUDIES OF ITS WORKERS OVER A SEVENTEEN YEAR PERIOD DURING WHICH TIME VINYL CHLORIDE EXPOSURE WERE REDUCED FROM WELL ABOVE TO BELOW 50 PPM. IN SPITE OF DILIGENT SEARCH, NO CASES OF DISEASE OF OVERT CONDITION WERE FOUND IN THIS STUDY. WE BELIEVE THAT EVERY CASE OF SUSPECTED OR DETERMINED ILL EFFECT FROM VINYL CHLORIDE IN LABORATORY ANIMALS OR MAN HAS BEEN RELATED TO MUCH HIGHER LEVELS OF EXPOSURE ON A PROLONGED BASIS.

THE VINYL CHLORIDE MONOMER - POLYVINYL CHLORIDE RESIN (PVC) INDUSTRY IMPACTS SUBSTANTIALLY ON THE ECONOMIC LIFE OF THE NATION. APPROXIMATELY 50 MONOMER AND RESIN PLANTS THROUGHOUT THE COUNTRY EMPLOY APPROXIMATELY 14,000 WORKERS. HUNDREDS OF PLANTS AROUND THE COUNTRY, EMPLOYING AN ESTIMATED 50,000 workers, PROCESS PVC INTO A MULTITUDE OF PRODUCTS WHICH, IN TURN, ARE USED BY AN ESTIMATED 600,000 TO 900,000 MORE WORKERS TO PRODUCE GOODS FOR INDUSTRY AND INDIVIDUAL CONSUMERS. THE VALUE ADDED BY THESE OPERATIONS IS MEASURED IN BILLIONS OF DOLLARS.

INDUSTRIES HEAVILY DEPENDENT ON PVC PRODUCTS INCLUDE BUILDING AND CONSTRUCTION, AUTOMOTIVE, MEDICAL PRODUCTS, ELECTRICAL WIRE AND CABLE, HOUSEHOLD FURNISHINGS, INDUSTRIAL AND HOUSEHOLD EQUIPMENT, AND PACKAGING PRODUCTS. OTHER POLYMERS CONTAINING VINYL CHLORIDE ARE USED IN FIBERS AND SURFACE COATINGS. IN MOST CASES, A WITHDRAWAL OF PVC PRODUCTS FROM THESE INDUSTRIES WOULD RESULT IN SUBSTANTIAL SHUTDOWNS OF PRODUCTION BECAUSE SUBSTITUTE MATERIALS EITHER DON NOT EXIST OR COULD NOT BE MADE AVAILABLE IN ADEQUATE QUANTITIES FOR MONTHS OR EVEN YEARS.

VINYL CHLORIDE MONOMER IS THE SINGLE MOST IMPORTANT MARKET FOR THE CHLORIDE-CAUSTIC INDUSTRY, ANOTHER BASIC PART OF OUR ECONOMY. A REDUCTION IN THE PRODUCTION OF CHLORIDE FOR VINYL CHLORIDE WOULD RESULT IN A SUBSTANTIAL WORSENING OF THE PRESENT SHORTAGE OF INDUSTRIAL ALKALI INCLUDING THAT NEEDED FOR ENVIRONMENTAL CONTROL PROCESSES.

WE BELIEVE THAT THE ADOPTION OF THE PROPOSED STANDARDS WOULD RESULT IN A VIRTUAL 100 0/0 SHUTDOWN OF PVC PRODUCING PLANTS. IMMEDIATE UNEMPLOYMENT OF A SUBSTANTIAL NUMBER OF THE WORKERS WHOLLY OR PARTLY DEPENDENT ON PVC PROCESSING FOR PVC PRODUCTS WOULD RESULT.

COMPLETELY NEW PLANTS, USING TECHNOLOGY NOT NOW EXISTING, WOULD HAVE TO BE DEVISED, THEN BUILT TO REPLACE PRESENT PRODUCTION FACILITIES OF THIS INDUSTRY. ECONOMIC FEASIBILITY OF SUCH REBUILDING IS HIGHLY QUESTIONABLE IN THE FACE OF THE PROPOSED REGULATIONS AND, IN ANY EVENT, A PERIOD OF AT LEAST FIVE YEARS WOULD BE REQUIRED EVEN IF FEASIBILITY WERE ASSURED.

IN VIEW OF THE ABOVE OSHA SHOULD CAREFULLY DEVELOP STANDARDS FOR EXPOSURE TO VINYL CHLORIDE USING THE REGULAR RULE-MAKING PROCEDURE. WITH SUCH A PROCEDURE, IT WILL BE POSSIBLE TO MOVE FORWARD IN AN ORDERLY FASHION WITH NEEDED OPPORTUNITY TO REVIEW IN DEPTH ALL OF THE FINDINGS OF SCIENCE, LABOR, AND INDUSTRY AND THE REGULATORY MEASURES THEMSELVES. SUCH A DETERMINATION WILL NOT BE ARBITRARY OR CAPRICIOUS, NOR WILL IT OPERATE TO THE SUBSTANTIAL DETRIMENT OF CONSUMER, LABOR AND INDUSTRY AS SEEMS INEVITABLE WITH THE HASTILY-CONCEIVED PROPOSED STANDARD OF NIOSH. THE REGULAR RULE-MAKING PROCEDURE SHOULD BE USED TO ESTABLISH REGULATION OF THIS INDUSTRY WHICH TOUCHES IN A SIGNIFICANT WAY UPON A SUBSTANTIAL SEGMENT OF THE AMERICAN ECONOMYM

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