Exhibit #1

UNITED STATES DEPARTMENT OF LABOR

Occupational Safety and Health Administration

In the Matter of: PERMANENT OCCUPATIONAL SAFETY AND HEALTH STANDARD FOR EXPOSURE TO VINYL CHLORIDE	Title 29, Code of Federal Regulations, §1910.93q, Vinyl chloride.

Petition for Stay of Effective Date of Standard

The Society of the Plastics Industry, Inc. (SPI), 1/ by its attorneys, hereby petitions the Assistant Secretary of Labor for Occupational Safety and Health to stay the recently promulgated standard for occupational exposure to vinyl chloride, 29 C.F.R. §1910.93q (39 Fed. Reg. 35890, October 4, 1974).

1/ The Society of the Plastics Industry, Inc. is a corporation organized under the Not-for-Profit Corporation Law of the State of New York. It is composed of approximately 1,400 member companies and individuals who supply raw materials; process or manufacture plastics or plastics products; engineer or construct molds or similar accessory equipment for the plastics industry; and engage in the manufacture of machinery used to make plastics products for materials of all types. The Society is the major national trade association of the plastics industry; its membership is responsible for an estimated 75% of the total dollar volume of sales of plastics in this country. It is through the SPI Vinyl Chloride Monomer and Polyvinyl Chloride Resin Producers Committee, an operating unit of SPI, that the plastics industry has coordinated its participation in the rulemaking proceedings concerning occupational exposure to vinyl chloride. As such, therefore, the SPI has a direct interest in this matter in its capacity as designated representative of the affected employers.

The primary ground for requesting this relief is, as set out in more detail in the attached Affidavit of Jerome H. Heckman, Esq., that the respiratory protection requirements of the standard are beyond the compliance capabilities of the industry. Firstly, the permitted equipment is not available in sufficient supply now nor will it be on January 1, 1975 or in the immediate future. Secondly, not only is much of the respiratory protective equipment specified for use under the Standard not as yet approved for the specified uses, but, on the basis of the attached memoranda from the Acting Director of the NIOSH Office of Research and Standards Development to the Acting Director of NIOSH dated October 18, 1974 and from the Acting Director of NIOSH to the Director of the OSHA Office of Standards, it is anticipated that such yet to be approved respiratory protective equipment will not be approved by January 1, 1975. Thirdly, a sufficient supply of such equipment cannot, even with all appropriate approvals, be made available in sufficient time for the industry to comply with the standard by its present effective date.

Failure to grant the requested relief would force large segments of the vinyl chloride monomer and polyvinyl chloride resin industry to cease manufacturing operations after December 31, 1974.

WHEREFORE, IT IS RESPECTFULLY REQUESTED that the Secretary expeditiously grant the relief requested herein, to wit: stay the effective date of that portion of the standard due to become effective January 1, 1975; and continue the aforementioned stay in effect until such time as sufficient quantities of approved respiratory protective equipment are available to the industry, or until a court determines that compliance with the relevant portions of the standard is not required.

Respectfully submitted,

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THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

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