



UNIROYAL CHEMICAL
Division of UNIROYAL, Inc.

TO: C. B. Westerhoff
M. C. Jasman
G. J. Higgins
J. R. Douglas
J. D. Porter
R. T. Shearer
E. B. Bezzeg

DATE: May 17, 1974

cc: EFH FJP RIM PRC NCW AEF
CJU JDL HLL RWS JHC GMB
EVO SEF MCJ CES CHK WMI
REH LFM

FROM: G. E. Brumbaugh

SUBJECT: Preparation of Objections to the Proposed Permanent VC Standard
by OSHA, 1910.93c

By Thursday, May 23rd, please prepare a list of objections to the proposed permanent standards. Take each item under your group's activity, and object to any provision that:

1. Is impossible to do or is difficult to do.
2. Causes additional safety hazards.
3. Does not appear to be justified.
4. Increases operating costs.
5. Reduces the productivity of the plant or personnel.

URL 20342

Try to make some estimation of the amount of productivity lost or increase in cost.

Please submit these lists to me. These lists will be reviewed by Ben Leach and the Control Plan Group.

The composite of all the objections will be prepared and set to Naugatuck for incorporation into the presentation to OSHA.

We must have this information in their hands by June 1, 1974.

Gerry Brumbaugh

GEB/ard

INTERCOMPANY CORRESPONDENCE