

UNION CARBIDE CORPORATION
COATINGS MATERIALS DEPARTMENT
270 PARK AVENUE, NEW YORK, N.Y. 10017

ROBERT W. WESSON
VICE PRESIDENT AND GENERAL MANAGER

April 11, 1975

RECEIVED
APR 18 1975
G. D. LLOYD

Union Carbide's solvent vinyl resins and dispersion resins are free from the OSHA standard on vinyl chloride monomer in all coatings and adhesive applications, according to a ruling by the U. S. Department of Labor in the attached letter.

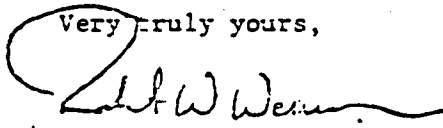
The OSHA ruling recognized these resins as "fabricated products" since their use in coatings and adhesives formulations do not involve mass melting sufficient to release vinyl chloride monomer.

The use of Union Carbide's solvent vinyl resins and dispersion resins relieves you from monitoring for vinyl chloride as a requirement for compliance with the OSHA regulations when good operating practices are followed. Furthermore, Union Carbide will not label solvent vinyl resins and dispersion resins containers per this ruling and will sell these resins with less than 1 PPM retained monomer.

You may want to use the attached letter to assure your employees and customers that coatings made with Union Carbide resins are exempt from the OSHA regulations.

Please feel free to contact your Union Carbide sales representative if you have any questions or problems.

Very truly yours,


R. W. Wesson

BFG13766

21441001



UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS

P.O. BOX 8004, SOUTH CHARLESTON, W. VA. 25303

SOUTH CHARLESTON PLANT

April 7, 1975

copy to
CTH, MAP, CO.
MILL. AGT. JJC

Dr. R. S. Brookman
Research Development & Technical Service
Firestone Plastics Company
P.O. Box 699
Pottstown, Pennsylvania 19464

Dear Bob:

Since you were in on the start of these negotiations, thought you might be interested in this interpretation by Mr. Grover C. Wrenn.

Best regards,

R. N. Wheeler, Jr.

RECEIVED
APR 10 1975
R. S. BROOKMAN

RNWJr/ra

Attachment

Copies to: R. A. PARK 4/14/75
C. E. FINKLINER
C. J. KLEINERT
J. J. CASSIDY, JR.

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U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
WASHINGTON, D.C. 20210



MAR 25 1975

RECEIVED

MAR 31 1975

R N WHEELER, JR.

Mr. R. N. Wheeler, Jr.
Union Carbide Corporation
Chemicals and Plastics
P.O. Box 8004
South Charleston, West Virginia 25303

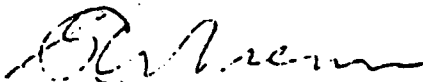
Dear Mr. Wheeler:

Your letter dated February 14 suggests that certain of Union Carbide Corporation's vinyl coating resins from its dispersion and solution vinyl resin processes should be considered "fabricated products." In support of that position, you state that the particular resins described are "fabricated" for use and application via coating technology; and further that the dispersion and solution vinyl resins contain less than one part per million by weight of residual vinyl chloride monomer which effectively precludes the possibility of employee exposures in excess of the action level in the subsequent transportation, handling or use of these resins.

The Occupational Safety and Health Administration standard for vinyl chloride defines a fabricated product as a "product made wholly or partly from polyvinyl chloride, which does not require further processing at temperatures, and for times sufficient to cause mass melting of the polyvinyl chloride resulting in the release of vinyl chloride." In reviewing the materials which you submitted, it is agreed that the term "fabricated products" includes those solution and dispersion polyvinyl chloride resins described as having application in the formulation of paints and coatings which do not undergo further processing involving mass melting.

It should be noted that the vinyl chloride standard would apply in all respects during the manufacturing of the solution and dispersion resins within Union Carbide Corporation facilities. Additionally, employers who used these resins in applications which would require further processing at temperatures sufficient to cause mass melting of the polyvinyl chloride, would be subject to the provisions of the standard.

Sincerely,


Grover C. Wrenn
Chief, Division of Health
Standards Development

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