



**UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS**

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SOUTH CHARLESTON PLANT

July 21, 1975

Mr. Grover C. Wrenn
Chief, Division of Health Standards Development
Occupational Safety and Health Administration
U. S. Department of Labor
Room N3663
200 Constitution Avenue, N. W.
Washington, D. C. 20004

Subject: Interpretation of Occupational Safety & Health
Administration Vinyl Chloride Standard

Dear Grover,

Thank you very much for arranging the meeting on July 16, 1975 with Messrs. Edward Klein, Gene Regad, and yourself to discuss the problems involved in amending the Vinyl Chloride Standard and to discuss ways to provide the vinyl chloride resin industry with relief from burdensome and unnecessary parts of the Standard. The discussion did much to create an understanding of the problems of both parties.

In reviewing my letter to you, dated May 2, 1975, on Classification of Union Carbide Corporation Vinyl Resins, I believe it still clearly states the problem and a possible solution of the low residual monomer vinyl resin. Summarizing the letter it states:

1. The health hazard protected against by the Occupational Safety and Health Administration Vinyl Chloride Standard is the inhalation of vinyl chloride monomer. The objective of reducing the inhalation of vinyl chloride monomer should be achieved with a minimum of industrial disruption while permitting OSHA to concentrate its enforcement effort in the most hazardous areas.
2. Vinyl resins containing less than one part per million of vinyl chloride monomer are subjected to one or more additional processing steps; i. e., they are "fabricated" to contain extremely low residual monomer content.

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3. Data has been presented showing that when resins containing less than one part per million of residual monomer are processed, including so-called "mass melting", the amount of vinyl chloride released to the work space does not even approach the action level limit of 0.5 ppm set by the OSHA Standard.

Based on the objective of the Vinyl Chloride Standard and the data presented, the logical approach to effectively utilize limited OSHA enforcement personnel, to provide for worker safety, and to provide relief for those resin manufacturers who are producing these low monomer resins at extra cost is to classify these resins as "fabricated" products, thus limiting the application of the Standard to areas where excessive hazard exists.

Union Carbide Corporation, a producer of many specialty vinyl chloride resins, markets these products world-wide to many customers - large and small. Within the United States alone it has 1,483 individual customers for vinyl resins. Most of these customers are small manufacturing establishments that purchase less than truck-load quantities. These customers, in turn, produce semifinished goods such as lacquers, plastisols, and organosols which are shipped to the ultimate user. These customers, as well as transportation companies, are withdrawing from handling and use of vinyl resins. The nature of this business is such that a clear statement of damage is not possible, but we can cite many cases of individual withdrawal as well as internal directives to not use vinyl resins in new applications. The loss of many small customers, as well as the loss of new applications, is tantamount to a slow termination of the business.

We would appreciate your expediting the response to our request for an interpretation of the status of our products and thus clarify our situation.

Very truly yours,



R. N. Wheeler, Jr.

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