

TO: J. TANZILLI
FROM: T. S. BIALKE

DATE: 4/17/84

PVC MSDS - HAMSEN PLASTICS

I am providing you the following in response to your request for comments on the Hamsen Plastics concern.

Concerns

1. Normal processing of PVC may cause upper respiratory tract, eye or skin irritation. This depends upon the method of processing (higher temperatures), volume processed and most importantly, the effectiveness of the local exhaust ventilation provided to the process. Certain individuals (few in number) may also become sensitized to the stabilizers or plasticizers contained in the PVC fumes.
2. Yes, PVC contains residual VCM, but the Company has generated data and mathematical models that show workplace concentration of VCM above 0.5 ppm are not expected if the RVCM is kept below a certain level.
3. Compounded PVC in cube form is incapable of releasing dust that would expose employees to an airborne concentration that would require them to wear respirators.
4. Yes, the OSHA VCM standard 29 CFR 1910.1017(d) requires "a program of initial monitoring...in each establishment to determine if there is any exposure, without the use of respirators, in excess of the action level." The OSHA VCM standard applies to the manufacture, reaction, package, repackaging, storage, handling or use of VCM or PVC, but does not apply to the handling or use of fabricated products made of PVC (1910.1017(a)). Injection molding operations fall under this requirement. What this section says is that a company must initially monitor for VCM and if the monitoring does not find VCM above 0.5 ppm, no further action is necessary. I think everyone will agree that the possibility of a company finding VCM above 0.5 ppm from an injection molding operation is very small.
5. Does this statement still apply to resins that have been stripped to below 25 mg/kg? I know this was a concern a few years ago, but is it realistic today?
6. This statement also applies to compounds.

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Conclusions

I recommend that the BFG Chemical Group develop four separate generic MSDS' for latex, PVC resin, compound cubes and compound powders. Having a MSDS for each of these very distinct product lines would reduce customer confusion and allow for a better explanation of the hazards, or lack of hazards in some cases, from the use of BFG PVC.

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