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THE GENERAL TIRE & RUBBER COMPANY

Comments on the Department of Labor, OSHA

Proposed Permanent Standard on Vinyl Chloride

29 CFR 1910.93q

GENC 000022

The only new exposure level data set forth in the introductory material to the proposed permanent standard is the preliminary report from Industrial Bio-Test Laboratories wherein 2 of 200 mice exposed to 50 parts per million concentrations of vinyl chloride seven hours per day, five days per week for approximately seven months developed angiosarcoma. Thus, on the basis of 2 mice, and without any correlation to human experience, it is now proposed that the permissible exposure to vinyl chloride be dropped from 50 parts per million to no detectable level without regard to technical feasibility, sociological or economic ramifications. Such a course of action has no basis in science or fact as recognized in the permanent standard wherein it is stated:

"... the question of a safer level of exposure for humans cannot be determined at this time, and may continue as a matter for scientific deliberation for many years."

The General Tire & Rubber Company would, in the interests of every reasonable and feasible precaution, support a permissible exposure level standard consisting of a time-weighted average of 25 parts per million and a ceiling level of 40 parts per million. These levels are technologically feasible, and scientifically and medically reasonable based upon present data and technology. It should be further noted that we submit and support these levels without regard to cost in achieving the same.

In addition, The General Tire & Rubber Company is dedicated to the eventual elimination of exposure to vinyl chloride in the production of polyvinyl chloride resins, and to the elimination