

GRAB

TO ALL C&P CONTACTS
TO ALL C&P ALTERNATE CONTACTS

PLANT MGRS. FILTS

ON OCTOBER 1ST, THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) ANNOUNCED A NEW, HIGHLY RESTRICTIVE STANDARD ON EXPOSURE TO VINYL CHLORIDE. EFFECTIVE JANUARY 1, 1975, EXPOSURE TO VINYL CHLORIDE MUST BE REDUCED UNDER THE NEW STANDARD TO LEVELS OF ONE PPM AVERAGED OVER ANY EIGHT HOUR PERIOD AND FIVE PPM AVERAGED OVER ANY PERIOD NO LONGER THAN 15 MINUTES. THE LIMITS ARE TO BE APPLIED TO ALL OPERATIONS IN MANUFACTURE, REACTION, PACKAGING, REPACKAGING, TRANSPORT, STORAGE, HANDLING AND USE OF VINYL CHLORIDE AND POLYVINYL CHLORIDE RESINS. WEARING OF RESPIRATORS WILL BE MANDATORY FOR WORKERS EXPOSED TO LEVELS GREATER THAN THE PERMISSIBLE EXPOSURE LIMITS.

UNION CARBIDE HAS STUDIED THE STANDARD AND CONCLUDES THAT IT SIMPLY DOES NOT KNOW HOW TO COMPLY WITH THE LIMIT OF 1 PPM (8-HR. TWA) WITHOUT EXCESSIVE USE OF RESPIRATORY PROTECTIVE EQUIPMENT. ADDITIONALLY, IT IS OUR CONCLUSION, BASED ON A CAREFUL REVIEW OF THE MOST ADVANCED ENGINEERING TECHNOLOGIES AND SYSTEMS KNOWN TO US PRESENTLY, THAT IT IS TECHNOLOGICALLY IMPOSSIBLE TO RETROFIT EXISTING POLYMERIZATION UNITS TO MEET THE NEW ONE PPM (8-HR TWA) EXPOSURE LIMIT. UNION CARBIDE DOES NOT RECOMMEND THE CONTINUOUS WEARING OF RESPIRATORS BY WORKERS IN ITS PVC PLANTS IN THAT THEY ARE UNCOMFORTABLE AND CAN CREATE OTHER HAZARDS IN PLANT OPERATIONS BY REDUCING WORKER VISION AND ABILITY TO COMMUNICATE.

UNION CARBIDE IS EXTREMELY CONCERNED ABOUT THE HEALTH OF ITS EMPLOYEES AND HAS PARTICIPATED ACTIVELY IN THE INVESTIGATION OF THE VCM HEALTH HAZARD. HOWEVER, WE BELIEVE, BASED ON THE DATA AVAILABLE TO DATE, THAT THE LIMITS ANNOUNCED ARE MUCH MORE RESTRICTIVE THAN NECESSARY TO PROTECT EMPLOYEES HEALTH. THEREFORE, TO PRESERVE THE JOBS OF SEVERAL HUNDRED WORKERS EMPLOYED IN ITS PVC RESIN AND VINYL FABRICATION PLANTS, AND IN THE INTERESTS OF ITS CUSTOMERS IN A CONTINUING SUPPLY OF PVC RESINS, UNION CARBIDE HAS REGRETFULLY CONCLUDED IT MUST EXERCISE ITS RIGHT TO PETITION IN THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT FOR REVIEW OF THE PERMANENT OSHA STANDARD AND HAS ASKED THAT THE EFFECTIVE DATE OF THE STANDARD BE STAYED UNTIL THE COURT HAS HAD THE OPPORTUNITY TO REVIEW IT. THE COURT WILL BE ASKED TO EXAMINE THE STANDARD AS TO WORK PRACTICES, MONITORING PROCEDURES AND EXPOSURE LIMITS IN THE LIGHT OF EMPLOYEE HEALTH MAINTENANCE AND THE ABILITY OF THE INDUSTRY TO COMPLY.

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