

SPI

THE SOCIETY OF THE PLASTICS INDUSTRY INC.
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For Immediate Release: Tuesday, October 1, 1974

**PLASTICS INDUSTRY LABELS OSHA
VINYL CHLORIDE STANDARDS UNREALISTIC**

The Occupational Safety and Health Administration (OSHA) permanent occupational health standard on vinyl chloride monomer announced today is unrealistic, probably will be impossible for most, if not all, of the industry to meet and appears to have been developed on some basis inconsistent with recorded facts, according to The Society of the Plastics Industry, Inc. (SPI)

SPI President Ralph L. Harding said that "OSHA may believe that it has adapted a compromise position between organized labor on the one hand and industry on the other, but the result is a standard that does not take into account in a practical way the known medical and technological facts."

Vinyl chloride monomer (VCM), an industrial chemical used in the production of polyvinyl chloride (PVC), a widely plastic resin, has been linked in recent months with a higher than normal incidence of angiosarcoma of the liver, a rare form of cancer, among previously highly exposed workers.

According to Mr. Harding, "the evidence presented at the OSHA public hearings in late June on VCM clearly showed that the employee deaths from angiosarcoma were a result of conditions existing decades ago, when exposure levels were many times greater than they are today. Furthermore, data developed by

Mr. Anton Vitti
October 1, 1974
Page Two

Kramer in New York (our long for SPI there), we relayed the petition for Review at precisely minutes after I received enclosure us that we should try to be secure the best possible for proceedings. We hope that our to file a Petition for Review have no definite way to know letter has been sent out since not have been able to check to see if someone else filed we did.

In any case, we feel be done as far as assuring a The "foot race" is now over evaluation of the new Standard in this respect, we are enclosing Labor press release made available the accompanying explanation Standard, an SPI press release in response to the OSHA action Order promulgating the Standard Register. The latter is, of document to be considered.

We are very grateful others in the companies recognize for all of their help; at that those of you who were not understand why the circumstances type of complete communication doubt that anyone will disagree Review should have been filed sends a problem, we can always The reason we filed--and, particularly grateful to our friends ing to allow us to file on the taneously so as to assure a case as the Society--is because we that it would be better to file

Mr. Anton Vittone
October 1, 1974
Page Three

clear that major parts of the
objectionable than think the
one else file first in a letter
and repeat later. Again, we
to file immediately, recognize
meeting to be held soon or
cision to file should be changed
position to withdraw the Per

I realize that much
be confusing to many of you
enclosed should help but, in
to prepare a more fully explained
additional information we do
can be sent along in the near
we hope this communication is
"early alert" report.

Co.



Enclosures

cc: VC and PVC Producers C

ASI 000012063

OTHER KEY PROVISIONS OF THE FINAL VINYL C

-- Employers must set up "regulated
"one and five ppm" limits, with access to

-- Plans for reducing exposure to the
available on request of OSHA.

-- Direct contact by employees with

-- Monitoring and measuring programs
levels exceed 0.5 ppm. Depending on level
least monthly or quarterly. They may be
measurements, no fewer than five working
to be less than 0.5 ppm.

-- Any change in processes that may
measurements for all affected employees.

-- Monitoring and measuring methods
not less than plus or minus 50 percent in
plus or minus 25 percent for levels greater

-- Where the regular monitoring program
a continuous monitoring and alarm system
danger if they are using air filtering respirators
must switch to respirators with a clean air

-- Employees and their representative
observe monitoring and measuring.

-- Protective garments as well as respirators
employees in hazardous situations, such as

-- Written plans must be prepared for
massive levels) in facilities making or using

- M

-- Employees in VCM or PVC operations must be trained fully on the nature of the hazards, protective measures, and the contents of the

-- Medical programs must include complete initial examinations. will be required every six months for employees who have worked in VCM for 10 or more years, and annually for all other exposed workers. All examinations will be acceptable if the examining physician states his reasons for substitution. All medical checks are at no cost to employee

-- Specified signs or labels are required at entrances to "regulated hazardous operations or emergency areas, on containers of PVC resin and VCM containers.

-- Records of required monitoring and measuring, medical records, and "authorized" workers must be kept for varying specified times, or be sent to the Director, National Institute for Occupational Safety and Health, if an employee is to do business before the expiration of retention periods.

-- Reports must be made to the nearest OSHA Area Director no later than 15 days after establishing a "regulated area, and within 24 hours of any "emergency. Also, reports to affected employees must be made within 10 days after monitoring measuring shows exposure in excess of the "one and five ppm" limits, including results of the measurements and steps being taken to reduce exposure to permissible levels.

VINYL CHLORIDE CHRONOLOGY OF EVENTS

January 22, 1974 -- OSHA was informed by the National Institute for Occupational Safety and Health (NIOSH) that the B. F. Goodrich Chemical Co. reported that several of its employees from a rare liver cancer (angiosarcoma) may have been occupationally related.

January 30, 1974 -- OSHA announced in the Federal Register a fact-finding mission on possible hazards involved with the manufacture and use of VCM.

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ASI 000012065

February 15, 1974 -- Public hearing

March 11-15, 1974 -- Staff members conducted an industrial hygiene fact-finding tour of the New Orleans and Baton Rouge area, to base exposure standards.

March 16-17, 1974 -- Assistant Secretary and key staff members, visited three chemical plants to determine conditions under which vinyl chloride is

April 5, 1974 -- OSHA issued an emergency order reducing the maximum allowable amounts of vinyl chloride to 50 ppm.

April 15, 1974 -- OSHA, NIOSH, and EPA representatives received from Bio-Test Lab data showing development of angiosarcomas in rats at concentrations of 50 ppm.

May 10, 1974 -- OSHA proposed standard for vinyl chloride due to expire Oct. 5. The proposal would limit exposure of workers to VCM.

May 24, 1974 -- OSHA published in the Federal Register notice on the proposed permanent rule to begin June 12, 1974.

June 12, 1974 -- OSHA published a draft proposed final rules. The statement was a finding of non-adequate Quality (CEQ) as being available for 45 days.

June 25-28, 1974 -- Public hearings on proposed rule.

July 8-11, 1974 -- Continuation of public hearings.

August 26, 1974 -- OSHA announced in the Federal Register public comment by Sept. 6 the preliminary results of a feasibility study on various exposure levels in New York City.

ASI 000012066

September 5, 1974 -- OSHA published the final environmental impact statement which was announced by CEQ Sept. 6 as being available for public comment until Sept. 25.

September 13, 1974 -- OSHA announced the availability for public comment of the draft final Snell study for public comment until Sept. 25.

October 4, 1974 -- Final health standard on vinyl chloride published in the Federal Register.
