

FOR20048

UNIROYAL CHEMICAL

Division of UNIROYAL, Inc.

January 23, 1978

cc: LEB CHK WMI RTS

RWK

4.18.16
4.20.03.01

B. R. Leach
Naugatuck

VCM Regulated Area

Enclosed memorandum is result of our January 4, 1978 meeting with OSHA. The Painesville location has discontinued maintenance of VCM regulated areas. Records and appropriate medical surveillance will be maintained.

URL 20502



R. M. Hall

RMH:nak
Att:

INTRACOMPANY CORRESPONDENCE

U. S. DEPARTMENT OF LABOR
 OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
 CLEVELAND AREA OFFICE - REGION V
 1240 EAST 9TH STREET, ROOM 847
 CLEVELAND, OHIO 44199

RECEIVED BY NAME

JAN 20 '78

January 18, 1978

FROM	TO	DATE
	LES	
	WMA	
	CHK	
	ATS	
	RMH	
	NAK	
	F	XX

Mr. R. M. Hall
 Factory Manager
 Uniroyal Chemical
 Division of Uniroyal, Inc.
 Painesville, Ohio 44077

Dear Mr. Hall:

In reply to your letter of January 4, 1978, requesting permission to deregulate Building 420-421 with respect to vinyl chloride, we feel that section 1910.1017 (a)(2) indicates the section of the standards does not apply to the handling or use of fabricated products made of polyvinyl chloride.

Polyvinyl chloride latex is already a fabricated product and unless as indicated in Section 1910.1017 (b)(6), the latex does not require further processing at temperatures and for times sufficient to cause mass melting of the polyvinyl chloride resulting in the release of vinyl chloride, a regulated area would not be needed.

Section 1910.1017(e)(1)(i) and (ii) indicates a regulated area shall be established where polyvinyl chloride is used and vinyl chloride concentrations are in excess of the permissible exposure limit.

Your data showing a minimum of 6,500 samples which average below the action level for 90 hour periods at monitoring points substantiates this interpretation, assuming the individual workers breathing zone is not closer to the source of materials than the monitoring point.

Very truly yours,

Kenneth Bowman
 KENNETH BOWMAN
 Area Director

URL 20503