

UNIROYAL CHEMICAL

Division of UNIROYAL, Inc.

January 6, 1978

cc w/Att: RME, WMI, CHK, RTS, LEB, EBB,
CES, 4.20.03.01, 4.28.01.298,
B. R. Leach - Naugatuck
E. J. Sowinski - Naugatuck
H. Turk - AD&K "1230"

To: 4.18.16

From: R. W. Kenney

Subject: Painesville Plant Vinyl Chloride Deregulation

A meeting was held on January 4, 1978 in the Cleveland office of OSHA to discuss deregulation of vinyl chloride in the Paracril® facilities at Painesville. Present were R. M. Hall, W. M. Iliff, R. W. Kenney and Robert L. Knarr, an Industrial Hygienist for OSHA.

The attached letter and data were presented to OSHA for their review. Mr. Knarr questioned the one result of 2.2 PPM and was advised that this result was recorded on December 23, 1977 when the plant was totally shutdown and therefore in our opinion is not a valid result. Mr. Knarr's interpretation of 1910.1017(a)(2) is that PVC latex would fall into the category of a fabricated product and that there should be no need for a regulated area for VCM at Painesville. He considers that we are in the same class as some-body processing polyvinyl chloride.

Mr. Knarr will draft a letter for the Area Director indicating there is no further need for our nitrile rubber plant to be regulated for VCM; however, he is not sure if the Area Director will be able to sign such a letter or whether a variance must be issued from Washington or a letter issued from their legal people as our case had been transferred from OSHA to the Solicitor's Office after the citation in 1974.

In any case, we are planning to deregulate immediately with formal notice being given to the Union.

Mr. Knarr indicated that as long as no major process changes are made the area should remain unregulated with regard to VCM. However, any major change should precipitate monitoring and contact with OSHA. Process changes that obviously would result in reduced exposure would not fall in this category. For example, a significant reduction in finishing temperatures obviously would reduce exposure, and it would not be necessary to bring this to OSHA's attention but it would be worth file documentation.

Although not discussed with OSHA, this obviously will be the case for suspension PVC replacing PVC latex.

RWK:spc
Attachment

R. W. Kenney
R. W. Kenney

CONFIDENTIAL DOCUMENT
PRODUCED PURSUANT TO
PROTECTIVE ORDER