



UNION CARBIDE CORPORATION

CHEMICALS AND PLASTICS

P. O. BOX 8004, SOUTH CHARLESTON, W. VA. 25303

1TH CHARLESTON PLANT

December 2, 1975

Mr. M. B. Darnall, III
Associate Corporate Counsel
Genesco
P. O. Box 941
Nashville, Tennessee 37202

Subject: OSHA Citation PVC Resin

Dear Mr. Darnall:

Attached is a certified copy of the letter from Mr. Grover C. Wrenn of OSHA to me dated March 25, 1975.

The Union Carbide Corporation vinyl resins involved in the OSHA citation were identified as:

Bakelite Vinyl Coating Resin VYHH
Bakelite Vinyl Coating Resin VYNS
Bakelite Vinyl Coating Resin VYNW

This designation relates to the end use of the resin and does not identify the resin process. Resin types VYHH and VYNS are made by the solution vinyl process referred to in Mr. Wrenn's letter. These are also identified as solution polyvinyl chloride resins. The VYNW resin is produced by Union Carbide Corporation's unique bulk or nonsolvent polymerization process. Resins from this process are characterized by a lower vinyl acetate content and a higher molecular weight than resins from the solution process. The nonsolvent or bulk resins are also very low in residual vinyl chloride monomer content, but since these resins find only minor use in the coating area, they were not considered in the studies leading up to Mr. Wrenn's March 25, 1975 letter. The value of having specific classes of resins mentioned in Mr. Wrenn's

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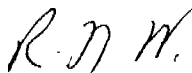
letter seems questionable to me because all the OSHA "fabricated product" interpretations to date have been application oriented, i. e. coatings, vacuum forming and PVC pipe welding.

The use of the term polyvinyl chloride can be very confusing to a person not wholly familiar with the industry. When a number of vinyl chloride monomer molecules are chemically combined to yield a much larger molecule the end material is called vinyl chloride polymer or polyvinyl chloride. Thus, when one talks of polyvinyl chloride, he is referring to a solid plastic composed wholly or partly of vinyl chloride polymer.

A further bit of information is that OSHA inspected PPG Industries' plant at Springdale, Pennsylvania in October, 1975. PPG Industries makes vinyl coating formulations at this plant similar to the Genesco plant. The OSHA inspector was very much concerned because Union Carbide Corporation's Solution Vinyl Resins in the plant bore no warning label while a competitor's product had a warning label. The inspector was shown a copy of the Wrenn letter and he sought help from his superiors. We immediately wrote to PPG Industries supporting our position on the OSHA Standard and offering help in contesting the potential citation. Apparently, after further discussion and consideration, OSHA stated they found no cause for a citation. I am attaching a copy of the PPG Industries' correspondence for your information and use if need be.

Regarding the OSHA citation at Genesco, we will provide all assistance we can in aiding your stand against it. I assume Mr. Warren Gregory has provided you with our correspondence to date in this matter.

Very truly yours,



R. N. Wheeler, Jr.

RNWJr. /pm
Attachments

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