



11/11/83
H. J. C.

Conoco Chemicals Company
A Division of Conoco Inc.
15990 North Barker's Landing Road
P.O. Box 19029
Houston, TX 77224

September 26, 1983

Mr. Ken Pieper
Vinyl Therm
8300 Grand Avenue South
Bloomington, MN 55240

Dear Mr. Pieper:

I understand that some questions have been raised in your plant regarding the safety and health aspects of PVC powder (compound). Following is information that should address these issues.

A [Bags containing PVC have the following warning printed on the: "Polyvinyl Chloride - Contains Vinyl Chloride - Vinyl Chloride is a cancer-suspect agent". This warning is specified by the OSHA Vinyl Chloride Standard which was promulgated in 1974. It was required based on the potential for residual VCM to be present in PVC containers that could result in employee exposures. As a result of changes in process technology and EPA regulations dealing with residual VCM concentrations in slurries during processing, the potential for significant levels of residual VCM to exist in PVC products is extremely low. For the past several years, personnel exposure measurements taken on our employees handling PVC product have indicated exposures to be well below 0.5 ppm (the OSHA action level) and frequently below detectable limits, or less than 0.1 ppm. However, despite these changes the OSHA regulation has not been changed.

Labeling requirement remains in effect

Exposure to PVC dust itself is the other health concern when handling the product. PVC dust is non-toxic and would be classed as a nuisance dust. Nuisance dusts have little adverse effect on the lungs and do not produce significant organic disease or toxic effect when exposures are kept under reasonable control. Long-term exposures to large amounts of dust could result in simple obstructive lung disease. The OSHA permissible exposure limit for nuisance dust is 15 mg/m³. This is a level at which you would probably have visibility problems as well. Normal good ventilation practice and housekeeping would maintain exposures far below this level.

There is often confusion concerning health effects observed in PVC workers. It should be noted that these reports predominately deal with workers involved in the manufacture of PVC, where vinyl chloride is used, and not workers processing PVC product.

Mr. Ken Pieper
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Please feel free to contact me if you have questions on the above or need more information.

Sincerely,

Thomas G. Grumbles

Thomas G. Grumbles, C.I.H.
Director, Industrial Hygiene

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cc H. R. Flammer
M. Heferan