

  
**SAINT-GOBAIN  
CORPORATION**

*Read  
24 file  
file*

April 5, 1993

Mr. Shashi Patel  
Labor Safety Officer  
Iowa Division of Labor Services  
1000 East Grand  
Des Moines, Iowa 50319

**RE: U.S. EPA EPCRA COMPLIANCE INSPECTION, DOCKET #VII-92-875E  
WOLVERINE TECHNOLOGIES, GRINNELL, IOWA**

Dear Mr. Patel:

This correspondence is directed to your attention at the request of our Mr. Kenneth L. Everhart, Jr., Manager of Safety and Environmental Affairs for CertainTeed Corporation's Vinyl Building Products Group and Roofing Products Group, and it is in direct response to your query relative to the captioned matter. Please know that Saint-Gobain Corporation represents the corporate organization of which CertainTeed Corporation (and which includes Wolverine Technologies) is a part.

The Industrial Hygiene staff of Saint-Gobain Corporation/CertainTeed Corporation (hereinafter collectively referred to as CertainTeed Corporation) did, on 11/15/85 conduct a Health Hazard evaluation of Polyvinyl Chloride (PVC) Resin, which evaluation was later amended on 12/08/86. While the evaluation conducted was for CertainTeed's Certavin CT-1110 PVC resin (chemical name ethene, chloro-, homopolymer) and which is manufactured at CertainTeed Corporation's Lake Charles, LA, polymer plant, please know that CertainTeed PVC resin and B F Goodrich resin are the same manufactured material, as is illustrated by the fact that each substance bears the same chemical description and each bears the same CAS number (eg: 9002-86-2).

The referenced Health Hazard Evaluation attached, was completed following the requirement of 29 CFR 1910.1200 Appendix A,B&C (revised 8/24/87) and is in full compliance with OSHA Instruction CPL 2-238C dated October 22, 1990, Appendix C "Hazard Evaluation Procedure". Based on this evaluation, CertainTeed Corporation has determined that Polyvinyl Chloride (PVC) resin is not considered a hazardous material under current Department of Labor definitions.

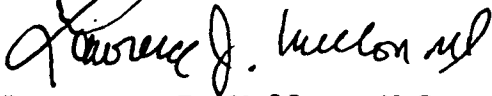
**CTL031888**

Page 2

Please know that the bibliography for the Health Hazard Evaluation for this substance included 16 different resources, which include four listed in 29 CFR 1910.1200 Appendix C, and it was from those detailed references that we have issued the aforementioned judgment.

Should you continue to have any questions in this matter, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence J. Mellon".

Lawrence J. Mellon, M.D.  
Vice President  
Corporate Health, Safety  
and Environmental Affairs

cc: Kenneth Everhart  
John Oleson

LJM/ccp

CTL031889