

UNION CARBIDE CORPORATION
Chemicals & Plastics

Medical - Occup Health Hg VC
270 Park Avenue, New York, New York 10017

RECD. *W. P. N.*

circ - Mgrs
PLANT MGRS. FILE

To: (See Attached Distribution List)

Date:

July 9, 1974

RECD. JUL 16 1974 W.R.V.

RECEIVED

Subject: Comments on Proposed Standard
For Occupational Exposure to VCM

JUL 16 1974

RECD. JUL 17 1974 DRR

W. P. N.

RECD. JUL 12 1974 DLE

The testimony to date clearly established that an assessment of the risk of VCM exposure at any level was made impossible by the absence of medical knowledge. Under such circumstance, all uncertainties must not be resolved in favor of health safety as proposed by OSHA in setting non-detectable limits on VCM.

Since the appropriate threshold level for safe toleration of VCM is unknown, OSHA proposes to protect against the unknown by simply assuming that exposure to any VCM presents a health hazard.

In doing so, OSHA disregards the documented human experience - SPI, Dow and Carbide testimony - which provides direct evidence to the contrary; namely, that exposure of workmen to moderate amounts of VCM over extended periods does not present a health hazard.

We must emphasize that our proposal rests not on the view that VCM exposure of workmen represents no risk but rather on the view that given the evidence, no substantial danger of angiosarcoma of the liver has been proven to exist with exposures of workmen to any moderate VCM concentrations (50 - 250 ppm, TWA - 8hr.) We hold that OSHA must base its limits of exposure on proof of a demonstrable hazard to emphasize health rather than a conjecture as to the possible relationship of incidence of disease vs. VCM exposure levels.

A. B. Steele
A. B. Steele

ABS:ml
Attachment

UCC 090699