

R. W. KENNEY



UNIROYAL CHEMICAL
Division of UNIROYAL, Inc.
Painesville, Ohio 44077
216-357-7574

January 4, 1978

Mr. Kenneth Bowman
Area Director
Occupational Safety and Health Administration
1240 East Ninth St., Room 847
Cleveland, OH 44199

Dear Mr. Bowman:

Re: Regulated Area - Vinyl Chloride

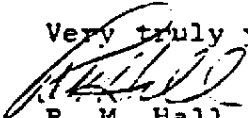
UNIROYAL is currently maintaining a regulated area for vinyl chloride at its Painesville, Ohio plant in Building 420-421 where polyvinyl chloride latex is processed with nitrile rubber latex to produce our nitrile vinyl blend. Changes in our operations have reduced the vinyl chloride levels below the permissible exposure limits of 1 ppm averaged over any 8 hour period and 5 ppm averaged over any period not exceeding 15 minutes. The most significant change is that the polyvinyl chloride latex presently being used has a vinyl chloride residual of less than 100 ppm compared with levels of over 5000 ppm in the latex used prior to 1977.

The air monitoring data enclosed, which was developed from our fixed point monitoring system indicates that we are continually below the permissible exposure limits.

Since we now have a situation which no longer requires the establishment of a regulated area for vinyl chloride as specified in 29 CFR 1910.1017, we plan to deregulate Building 420-421 effective December 31, 1977. With deregulation of these facilities the UNIROYAL Painesville location will have no VCM regulated areas.

I would appreciate receiving your written concurrence with this action prior to January 31, 1978.

Very truly yours,


R. M. Hall
Factory Manager
UNIROYAL Chemical
Division of UNIROYAL, Inc.

RMH:nak
Enc.

URL 20509

UNIROYAL CHEMICAL
DIVISION OF UNIROYAL, INC.
PAINESVILLE, OHIO

NOVEMBER, 1977

VINYL CHLORIDE MONITORING

	<u>Indiv. High Results</u> <u>8-Hour Period</u>			<u>Average Results</u> <u>8-Hour Period</u>			<u>No. of 8 Hour</u> <u>Periods</u>	<u>Analyses for</u> <u>8-Hour Period</u>
	<u>High</u>	<u>Low</u>	<u>Avg.</u>	<u>High</u>	<u>Low</u>	<u>Avg.</u>		
Zone 1 N.E. Warehouse Bldg. 420	0.4	0	0.06	0	0	0.0	90	146
Zone 2 Crumb Bagging	0.3	0	0.03	0	0	0.0	90	73
Zone 3 Baler Station	0.3	0	0.03	0	0	0.0	90	73
Zone 4 Floc Deck	0.3	0	0.06	0	0	0.0	90	146
Zone 5 Floc Control Room	0.2	0	0.04	0	0	0.0	90	73
Zone 6 Lower Blend Tank Area	0.3	0	0.05	0	0	0.0	90	146
Zone 7 Upper Blend Tank Area	0.3	0	0.03	0	0	0.0	90	73
Zone 8 Extruder	0.3	0	0.03	0	0	0.0	90	146
Zone 9 PVC Unloading Station	0.3	0	0.02	0	0	0.0	90	73

13 Sample Points
6.5 Min. Sample Cycles

URL 20510

UNIROYAL CHEMICAL
DIVISION OF UNIROYAL, INC.
PAINESVILLE, OHIO

DECEMBER, 1977

VINYL CHLORIDE MONITORING

	Indiv. High Results 8-Hour Period			Average Results 8-Hour Period			No. of 8 Hour Periods	Analyses for 8-Hour Period
	High	Low	Avg.	High	Low	Avg.		
Zone 1 N.E. Warehouse Bldg. 420	2.2	0.0	0.07	0.0	0.0	0.0	86	146
Zone 2 Crumb Bagging	0.2	0.0	0.02	0.0	0.0	0.0	86	73
Zone 3 Baler Station	0.4	0.0	0.03	0.0	0.0	0.0	86	73
Zone 4 Floc Deck	0.3	0.0	0.05	0.0	0.0	0.0	86	146
Zone 5 Floc Control Room	0.3	0.0	0.03	0.0	0.0	0.0	86	73
Zone 6 Lower Blend Tank Area	0.4	0.0	0.04	0.0	0.0	0.0	86	146
Zone 7 Upper Blend Tank Area	0.6	0.0	0.04	0.0	0.0	0.0	86	73
Zone 8 Extruder	0.5	0.0	0.05	0.0	0.0	0.0	86	146
Zone 9 PVC Unloading Station	0.1	0.0	0.02	0.0	0.0	0.0	86	73

URL 20511

bcc: WMI CHK RTS LEB CES RWK(4)
B. R. Leach - Naug.
R. L. Bergen - Naug.
E. J. Sowinski - Naug.
H. Turk - "1230" A. D. & K.

URL 20512