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THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

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FOR IMMEDIATE RELEASE (TUESDAY, JUNE 25, 1974)

PLASTICS INDUSTRY PROPOSES
EMPLOYEE HEALTH STANDARD

Washington, D. C. -- The plastics industry will propose a new standard for employee safety in the vinyl chloride and polyvinyl chloride industries at public hearings this week before the Occupational Safety and Health Administration (OSHA). The industry proposal calls for a stepped reduction of permissible levels of vinyl chloride in workplace air.

According to the industry, its recommended standard will be feasible over the next several years, assuming the development of new control technology.

The imposition of a "no detectable level" of vinyl chloride, as proposed by OSHA, would shut down the polyvinyl chloride industry and could result in an overall loss of 2.2 million jobs, an independent economic survey will report.

Vinyl chloride has been linked in recent months with angiosarcoma of the liver among previously heavily exposed workers.

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The industry proposal, prepared for presentation at the OSHA hearings by Anton Vittone, chairman of The Society of the Plastics Industry's (SPI) Committee of Vinyl Chloride Monomer (VCM) and Polyvinyl Chloride (PVC) Producers, and president of B. F. Goodrich Chemical Co., recommends:

For PVC Resin Plants

- ... Effective October 5, 1974, a ceiling of 40 parts per million (ppm) of VCM and a maximum daily time weighted average of 25 ppm. Levels above 40 ppm would require the use of practical and effective respiratory protection.
- ... Effective October 5, 1975, a ceiling level of 25 ppm with no time weighted average. Levels above 25 ppm would require the use of practical and effective respiratory protection.
- ... Effective October 5, 1976, a ceiling level of 25 ppm with a maximum time weighted average of 10 ppm. Levels above 25 ppm would require the use of practical and effective respiratory protection.

For VCM Producing Plants

- ... Effective October 5, 1974, a ceiling of 25 ppm and a maximum time weighted average of 10 ppm. Levels above 25 ppm would require the utilization of practical and effective respiratory protection.
- ... Effective October 5, 1977, a ceiling of 10 ppm and a maximum time weighted average of 5 ppm. Levels above 10 ppm would require the utilization of practical and effective respiratory protection.

Mr. Vittone said: "Such a commitment cannot be accomplished overnight since, in certain areas, the technology

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for accomplishing it is, as yet, not developed and, when developed, facilities must be installed requiring time for engineering, procurement, and installation."

He emphasized that the Committee is unanimous in its position that OSHA's proposed permanent standard of "no detectable level" is not technologically feasible and, if adopted, would shut down the industry.

Ralph L. Harding, Jr., President of SPI and the scheduled lead-off witness for the industry group, said, "The companies represented here today are sincerely concerned with providing all appropriate and necessary safeguards. They have already achieved substantial improvement in their operations. They are preparing to do whatever is deemed necessary in the way of substantial modifications to plant, process, and product.

"They have a very strong personal stake in the medical facts and in the safeguards. Nobody has to remind them of their responsibilities to their fellow workers."

Jerome H. Heckman, SPI's general counsel, will follow Mr. Harding with an overview of the plastics industry's position with respect to the vinyl chloride problems which includes the following:

... OSHA may rely on the plastics industry to recognize that so long as any doubt remains as to safety levels

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and employee or other exposure, it is incumbent upon manufacturers to make the workplace and general environment as risk-free as feasible.

- ... SPI believes it essential that any final standard adopted by the government take into balanced account the full spectrum of public and employee health considerations, social and economic impact, as well as other public interest factors.
- ... At this precarious state of its knowledge SPI believes that misplaced reliance on mere suspicions rather than proven data, or precipitous and emotional reaction to such incomplete information, together with a narrowly construed interpretation of interests, could lead to major economic consequences.
- ... The plastics industry has moved responsibly in all respects to obtain hard data and to plan to deal promptly and effectively with the vinyl chloride question.

The next scheduled witness--Vince P. Ficcaglia, manager of economic analysis and forecasting of Arthur D. Little, Inc. (ADL) of Cambridge, Massachusetts--will summarize the conclusions of a recently published report by Arthur D. Little, Inc. prepared for the VCM and PVC Committee titled "United States Polyvinyl Chloride Resin Industry Impact Analysis":

- ... An immediate shutdown of all polyvinyl chloride (PVC) resin plants in the U.S. and the subsequent unavailability of PVC resin could result in a loss of 1.7 - 2.2 million jobs in consuming and related industries and a loss of domestic production value of \$65-90 billion annually.
- ... The extent to which materials could be substituted for PVC resin in the immediate term (less than one

year), we believe, is quite limited and, therefore, would have an insignificant effect upon reducing the potential job and domestic production losses noted above.

- ... Because of the high degree of dependency on PVC resin in the building and construction and motor vehicle sectors, these two segments of our economy would suffer the greatest share of the total impact.
- ... Unavailability of PVC resin will have production bottleneck effects in terms of insulated wire and cable, flooring, upholstery, and many other materials.
- ... The economic impact of loss in production and employment would be felt by all regions of the country.

Other major points to be raised by industry witnesses testifying on behalf of SPI include:

- ... On the basis of the available evidence, it would appear that the national incidence of angiosarcoma of the liver has been underestimated in the past.
- ... A medical survey of present and past industry employees shows, in general, no greater incidence of liver abnormality, even among long term employees, than exists among the general public.
- ... The use of air supplied respirators, as recommended by OSHA, to reduce worker exposure below permissible levels is an impractical substitute for feasible engineering controls, except for short periods of time or in emergencies.
- ... Since there is no single reliable method for the detection of liver abnormalities, medical examination procedures should be left to the discretion of the examining physician.
- ... Since levels of vinyl chloride in the air of PVC fabricating plants are, even today, extremely low, the full requirements of the proposed standard should not be applied to the fabricating industry.

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... labels and signs proposed by OSHA are unnecessarily alarming and should be changed to stress precautions that employees should take for the safe handling of PVC resin.

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