



Conoco Chemicals
Continental Oil Company
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June 20, 1974

Docket Officer
Docket OSH-36
Room 230
1726 M Street, N.W.
Occupational Safety and Health Administration
Washington, D. C. 20210

Dear Sir:

Continental Oil Company manufactures about 500 million pounds of polyvinyl chloride (PVC) per year at two plants, one located in Aberdeen, Mississippi, and the other at Oklahoma City, Oklahoma. Continental Oil Company also produces about 700 million pounds of vinyl chloride monomer (VCM) at a plant located in Lake Charles, Louisiana. The proposed occupational health and safety regulations regarding vinyl chloride as published in the Federal Register, pp. 16896-16900, Vol. 39, No. 92 - Friday, May 10, 1974, are of significant concern to Continental Oil Company.

We wish to record comments regarding (a) proposed permanent standard for Vinyl Chloride, § 1910.93q, (b) problems associated with analytical detection of vinyl chloride, (c) information related to large polymerization reactors, and (d) the economic impact of a "no detectable level" of VCM upon Continental Oil Company employees.

In summary, the recommended Occupational Health Standard regulating vinyl chloride, dated May 10, 1974, will have a significant impact upon the economy of the United States and upon Continental Oil Company operations should the standard be implemented as proposed. It is our belief that the proposed standards would result in the cessation of production for an extended period of time because of the improbability of meeting a "non-detectable level" for VCM in the work place. Continental Oil Company has made significant improvements in its PVC manufacturing operations towards reducing exposure of employees to VCM vapors and we are convinced that considerable additional improvements in this respect can and will be made by our plants and the industry.

Very truly yours,

R. W. Gerwig, Vice President
Continental Oil Company

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