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**UNION
CARBIDE**

**UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS**

P. O. BOX 471, TEXAS CITY, TEXAS 77590

PLANT MGRS. FILES

RECD. *Noted JSH*

August 16, 1974

Mr. Howard J. Schulte
Deputy Assistant Secretary
United States Department of Labor
Fourteenth Street and Constitution Avenue
Washington, D.C. 20210

Dear Mr. Schulte:

During your visit to Texas City last March, it was brought out that we were in the process of reconstructing the work history of each of our operators who had been employed in our PVC and VCM operations since production was initiated in 1948. This compilation is essentially complete and the attached printout represents the effort to date. Since you and Mr. Stender showed some interest in the fact that Carbide was able to assemble such a reconstruction, I thought you might like to see the fruits of this effort.

Many of the employees involved in the 1948 start-up continue to be engaged in the manufacture of PVC resins. The survey shows that we have some 46 operators (does not include maintenance personnel) with over 15 years of work history in the manufacture of either PVC or VCM. Twenty-three of these have had over 20 years. The study turned up 312 operators who had worked in units under varying TWA VCM exposures ranging from an estimated 4 PPM to 200 PPM. The sum total of the 312 employees' assignments to these particular operations is 2,007 years. The average TWA exposure for these employees while at the work place was an estimated 47.5 PPM!

Each employee has been accounted for and no case of angiosarcoma of the liver has been identified. As a matter of fact, for those employees still working at Texas City or who have participated in our multiphasic screening program that was started in 1969, we see no correlation between their exposure to VCM and any medical abnormality.

There is one aspect of the pending standard, Mr. Schulte, that I would like to mention and that is the concept of having a ceiling value or excursion level on VCM exposure. I personally do not know how occasional exposures over, say, 50 PPM can be prevented or even detected when they occur. This letter is getting a little long already and I won't go into the matter here, but if you have any desire to discuss it further please call me at your convenience at (713) 945-7411. I accept and recognize the value of a reasonable eight-hour TWA level as measured by area monitoring backed up

UCC 090744

Mr. Howard J. Schulte

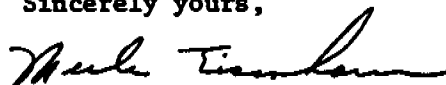
-2-

August 16, 1974

by some personnel monitoring. Also, employees should not knowingly be exposed to certain concentrations of VCM. I'm dismayed by the prospect that data of the quality we have accumulated here at Texas City may not receive sufficient weight as the permanent standard is written. Based on my own personal experience and my observations of many of those employees on the attached printout whom I have worked with since 1948, I cannot gracefully accept the proposition that a zero detectable level for VCM is necessary to protect employees' health.

My regards to Mr. Stender, and if there is any way we at Union Carbide can be of further assistance in this matter, we are at your service.

Sincerely yours,



M. E. Eisenhower

MEE/ebm

Attachment

cc: Mr. J. W. Whittlesey, NYO

Dr. A. B. Steele, NYO

Mr. R. B. Wheeler, 514

Mr. J. E. Levertou, 515

→ ~~Mr. R. W. Senior / Mr. D. L. Eagle, 515~~ ✓

UCC 090745

REC'D

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270 PARK AVENUE
NEW YORK, N. Y. 10017
681-6787

Medical - Occup.
Health Haz - VC -

PLANT MGRS. FILES

REGISTERED MAIL
RETURN RECEIPT REQUESTED

August 16, 1974

Mr. Julius Jimeno
Occupational Safety and Health Administration
United States Department of Labor
1336 M Street, N.W.
Room 200
Washington, D.C. 20210

Re: Docket - OSH-36

Dear Mr. Jimeno:

I am enclosing three copies of three additional documents which I should like to include in the record of the above docket on vinyl chloride. They are as follows:

1. Paper prepared by Mr. R. N. Wheeler, Jr., Union Carbide's Vinyl Chloride Monomer - Polyvinyl Chloride Manager, which sets forth the difficulties which have been found to exist with the control and recovery of vinyl chloride emissions and which tends to indicate that proposals made in testimony before you already with respect to the ease of such control may be considerably over-rated. This in turn is relevant to your inquiry on the feasibility of control of vinyl chloride monomer.

2. The second document also prepared under the direction of Mr. Wheeler by Mr. W. R. Manning which addresses attention to the difficulties of undertaking new engineering products particularly with reference to the time necessary for completion. This is supported by recent magazine articles showing the waiting time for equipment delivery which also must be taken into account on top of the necessary lead time required for undertaking acceptable improvement projects such as would be required to meet any severely restrictive new vinyl chloride monomer standard. This material, of course, is relevant to the question of engineering feasibility and has not been given sufficient emphasis in the testimony submitted to you to date.

3. This document is an alphabetical list of all employees at Union Carbide's Texas City, Texas plant who have ever been exposed

UCC 090746

Mr. Julius Jimeno

-2-

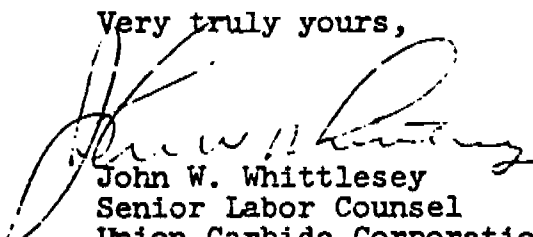
August 16, 1974

to vinyl chloride monomer. It lists the date of exposure, the length of time of the exposure, and the total as well as the time weighted average exposure to vinyl chloride. It covers a total of 312 individuals of whom 23 have had over 20 years of exposure, 23 have had 15-20 years of exposure, 34 have had 10-15 years of exposure, 15 have had 5-10 years of exposure and the balance of 182 have had 0-5 years of exposure. The document represents a total of some 2,000 years of exposure at an average rate of 47.5 parts per million. It is a complete listing of these employees. The significance, of course, for this hearing is that not one of those employees regardless of the length of exposure or the concentration, which in some cases average 200 parts per million, have ever had angiosarcoma or any other physical impairment of any sort attributable in any way to exposure to vinyl chloride monomer. The tabulation then supplements the testimony of Dr. Dern hl on behalf of SPI and Mr. R. J. Hughes on behalf of Union Carbide.

These documents in my judgment are of great significance in this matter, indicating as they do the validity of the position urged upon you by industry generally and Union Carbide in particular that no evidence whatever exists to support adoption of the proposed OSHA standard on vinyl chloride monomer exposure.

Very truly yours,

Enclosures
JWW:m


John W. Whittlesey
Senior Labor Counsel
Union Carbide Corporation

UCC 090747

Mr. Julius Jimeno

-3-

August 16, 1974

bcc: Dr. A. B. Steele
Dr. D. H. Glenn
Mr. R. N. Wheeler
Mr. R. E. Graebert
Dr. E. Q. Hull
Dr. C. U. Dernehl
Mr. D. E. Deese
Mr. R. T. Bradley
Mr. J. B. Leverton
Mr. R. W. Sesler
Mr. D. L. Engle
Mr. T. W. Carmody
Mr. R. J. Hughes

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