



## INTER-COMPANY AND OFFICE CORRESPONDENCE

**TO:** D. Weinstein  
Law Department  
Columbus

**FROM:** J. E. Darling

{ Dept.  
Branch  
Division  
Company

**LOCATED AT:** Leominster, Ma.

**SUBJECT:** OSHA Standard (1910.1017)

**DATE:** April 16, 1976

I have attached for your information a revised copy of the Federal Health Standard for VCM Exposure which will be given to sub-contractors. This is essentially the same letter which you have previously approved with minor modifications to reflect the permanent regulations in effect since 4/1/76.

**RECEIVED**

APR 19 1976

DAVID A. WEINSTEIN  
LAW DEPARTMENT

J. E. Darling

JED:sgs

Att.

cc: H. R. Jepsen  
R. Mercier  
S. J. Moll

KLD  
PJT

BOR 014457



FEDERAL HEALTH STANDARD APPLICABLE TO SERVICES RENDERED  
BY YOU

As you are aware, a condition of your rendering services to Borden is that your employees follow all plant rules and regulations. A number of these rules and regulations relate to a federal health standard (1910.1017) promulgated by the United States Department of Labor, Occupational Safety and Health Administration, applicable to the manufacture, reaction, packaging, repackaging, storage, handling or use of vinyl chloride or polyvinyl chloride. The work conducted at our facilities involves these activities and, thus, they are subject to regulation under this standard. In addition, certain of the various sections of the standard will be applicable to you since your employees will be working in this environment.

For your convenience we will briefly summarize the standard to highlight some of the obligations imposed on employers. This summary does not cover each and every section, thus we suggest that you review the standard in its entirety so that you may familiarize yourself with it and determine applicability to your services.

1. No employee may be exposed to vinyl chloride in excess of 1.0 ppm for an 8 hour time weighted average. Regulated areas shall be established where vinyl chloride concentrations are in excess of 1.0 ppm. Access to such areas shall be limited to authorized persons and a daily roster shall be made of authorized persons who enter such areas. 1910.1017 (e).
2. Employee exposures to vinyl chloride shall be controlled to at or below 1.0 ppm by engineering, work practice and personal protective controls (respirators and protective garments). 1910.1017 (f). *1.0 ppm average - any 5 hr period*
3. After April 1, 1976, no employee may be exposed to vinyl chloride in excess of 5 ppm for 15 minutes without the use of appropriate respiratory protective equipment. 1910.1017 (g).
4. Each employee exposed, without regard to the use of respirators, to vinyl chloride in excess of 0.5 ppm shall be provided an opportunity for physical examinations and tests which are as follows:
  - a. A general physical examination shall be performed, with specific attention to detecting enlargement of liver, spleen or kidneys or dysfunction in these organs, and for abnormalities in skin, connective tissues and the pulmonary system.



4. (Continued)

b. A medical history shall be taken, including the following topics:

- (1) Alcohol intake
- (2) Past history of hepatitis
- (3) Work history and past exposure to potential hepatotoxic agents, including drugs and chemicals
- (4) Past history of blood transfusions
- (5) Past history of hospitalizations

c. A serum specimen shall be obtained and determinations made of:

- (1) Total bilirubin
- (2) Alkaline phosphatase
- (3) Serum glutamic oxalacetic transaminase (SGOT)
- (4) Serum glutamic pyruvic transaminase (SGPT)
- (5) Gamma glutamyl transpeptidase

A written statement must be obtained, by the employee, from the examining physician of the employee's suitability for exposure to vinyl chloride including use of protective equipment and respirators and a copy provided the employee. 1910.1017 (k). All medical records, in this regard, must be maintained for a minimum of 30 years. 1910.1017 (n).

5. Each employee engaged in vinyl chloride or polyvinyl chloride operations shall be provided training in a program relating to the hazards of vinyl chloride and precautions for its safe use. 1910.1017 (j).
6. Monitoring and measurement shall be conducted to determine employee exposures, without regard to the use of respirators, at least monthly where employees are exposed to vinyl chloride in excess of 1.0 ppm. 1910.1017 (d). Records of monitoring and measurements shall be maintained for not less than 30 years. 1910.1017 (n). *~*

In connection with the aforementioned sections, please be advised that Borden will do the following:

1. Provide all necessary protective devices and equipment. In the event the vinyl chloride levels exceeds 5 ppm, your employees will be evacuated from the area.



2. Undertake monitoring and measurements on a monthly basis to determine employee exposures to vinyl chloride in excess of 1.0 ppm without regard to the use of respirators and provide exposure data in a form suitable to maintain in your employee records. Each employee will be monitored by use of a personal device carried on the employee's person during an eight (8) hour day.
3. Provide access to medical facilities capable of performing the required physical examinations for your employee including a lung function examination (to determine ability to work safely in respiratory equipment) prior to working on the Borden site. The costs incurred for these examinations should be considered as part of your costs when computing either your bid or your hourly rate on a T and M basis.
4. Provide required training of your employees as to the hazards of vinyl chloride and precautions for its safe use.

If you have any questions, please do not hesitate to contact Borden.