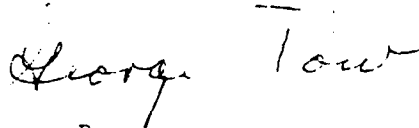


Managers' Notice
No. 531
May 31, 1974

Subject: Customer Communication - Government
Proposed VCM Exposure Standard

The attached communication was sent to all our vinyl plastics, vinyl latex, elastomer polyblend, selected Abson customers and our field sales force. Direct contacts will be made with key customers to enlist their active support.

If you can be of any assistance, please contact W. S. Lodge or P. J. Weaver, Cleveland Marketing.



George Pow
Director of Employee Relations
B.F. Goodrich Chemical Company

Distribution: Cleveland Office
(Plants & Technical Centers --
TWX & Telecopier)

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B. F. Goodrich Chemical Company

A DIVISION OF THE B. F. GOODRICH COMPANY

6100 OAK TREE BOULEVARD • CLEVELAND, OHIO 44131 • PHONE: 216-524-0200

May 30, 1974

Urgent!

Gentlemen:

In our last communication with you on May 14, 1974 relative to OSHA's proposed standard for exposure to vinyl chloride monomer, we mentioned that we would contact you when we believed your assistance would be appropriate in preparation for OSHA hearings. OSHA (Occupational Safety & Health Administration, Department of Labor) has set a hearing date of June 25, 1974. This early date was unexpected. Your assistance is needed now!

On May 10, 1974 OSHA published a Proposed Permanent Standard for Exposure to Vinyl Chloride Monomer with allowable exposure to vinyl chloride limited to "non-detectable" level. Please refer to Federal Register, Volume 39, Number 92, pages 16896-16900 dated May 10, 1974. This proposed standard covers vinyl chloride manufacturing, polyvinyl chloride resin manufacturing and we believe that vinyl material processors, such as your company, are intended to be included.

The proposed standard would require that you monitor vinyl chloride levels, provide detailed medical exams and medical surveillance programs, provide air fed respirators, full body protective clothing and keep detailed records. We question whether this provision is practical for you as a vinyl material processor or justified by medical data based on human experience. If you have data relative to the probable vinyl chloride exposure level to your workers over an extended period of time together with medical data you should submit information to OSHA.

A non-detectable level does not appear to be possible with current technology and, if imposed, would ultimately cause the discontinuance of PVC production. The Society of the Plastics Industry noted in a news release of May 10, 1974 that a reduction to exposure levels as proposed would make it virtually impossible for PVC plants to operate. Time is required to break technological barriers. Given time, we are confident that we can develop the technology and equipment to reduce substantially vinyl chloride exposure in our plants and reduce residual vinyl chloride in the dry resin. This will result in negligible exposure to your workers.

Since substitute raw materials and equipment are not readily available to replace PVC materials, the social and economic impact on you and your

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customers could be expected to be severe. We believe it is imperative that you contact OSHA so that they understand the significance of a major cut-back of vinyl material production to your company, your employees, and your community. You should respond no later than June 10 to OSHA if you plan only a written comment. You are invited to prepare economic impact statements as outlined in the Federal Register notice, Volume 39, Number 80, page 14522 - April 24, 1974.

For example, if you manufacture vinyl insulated wiring for automotive, appliance, construction and communications applications you could state that you are not equipped to substitute rubber insulation and that a specific number of jobs would be eliminated. Further, you should indicate that your customers for these applications have agreed that they would not have a suitable substitute and would have to discontinue manufacture thus eliminating thousands more jobs down the line. Assuming substitute raw materials were available you should give an estimate of the number of years needed for engineering, design and installation of new fabricating equipment.

Your appearance at the hearing in person would be a stronger and more effective way of getting your views across. It is scheduled for June 25, 1974 in Washington, D. C. and you can refer to the Federal Register, Volume 39, Number 102, page 18303 dated May 24, 1974 for details. If you are able to appear in person you will have to file notice by June 17 with:

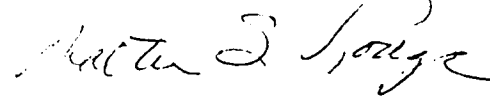
Ms. Joanne Goodell
Docket OSH-36: OSHA
1726 M Street, N. W., Room 200
U. S. Department of Labor
Washington, D. C. 20210

In summary, you must respond to Mr. John Stender, Assistant Secretary of Labor, at the above address by June 10 if you plan a written statement and by June 17 to Ms. Goodell if you plan to appear and comment at the hearing. The Federal Register issues referred to in this letter are available from our field sales offices.

We are confident you will do your part to see that OSHA weighs risk and benefit in preparing a workable standard.

Yours very truly,

B.F. GOODRICH CHEMICAL COMPANY



Walter S. Lodge
General Sales Manager

/ja

P.S. If you present any comments, we would appreciate a copy.

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