EMPLOYEE RELATIONS DEPARTMENT
Wilmington, Delaware

Copy to:
D. H. Dawson
Vice President
G. E. Holbrook
Vice President

May 20, 1966
File OH - 430

DEFENDANT'S EXHIBIT
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TO: GENERAL MANAGERS
CHIEF ENGINEER, ENGINEERING DEPARTMENT
DIRECTOR, CENTRAL RESEARCH DEPARTMENT
DIRECTOR, DEVELOPMENT DEPARTMENT

THRESHOLD LIMIT VALUES

On April 19, 1966, the MCA Board of Directors, upon recommendation of its Medical Advisory Committee, approved the attached policy statement concerning Threshold Limit Values. In it, member companies are urged to give favorable consideration to the establishment of surveillance facilities and related medical program as suggested in the statement.

The importance of Threshold Limit Values to the chemical industry lies in the fact that, as issued by the American Conference of Governmental Industrial Hygienists, they are intended to be unofficial guides to good industrial hygiene practice, but are now being adopted by an increasing number of states as legal limits of exposure of workmen. The engineering cost of compliance with such limits is such that the chemical industry has an economic interest in seeing that the Threshold Limit Values are valid, but not more restrictive than is necessary for the protection of the workers' health.

Our Company is doing a commendable job in protecting the health of its workers. It does this by establishing a priori engineering guides for safe exposure limits and through continued medical observation of the workers.

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In general, it has not been necessary for the successful operation of this program to determine quantitatively the actual day-to-day exposure of the workers on the job. As a result, favorable Company experience can seldom be used to validate or refute a suggested numerical Threshold Limit Value.

The chemical industry can, if it wishes, have a positive influence on Threshold Limit Values, but only if it can relate quantitative exposure levels to effects or lack of effects through documented medical observations.

It would appear desirable for each department, in consultation with the Medical Division and Haskell Laboratory, to consider the expansion of its employee health program to include the accumulation of data on the levels of employee exposures to those atmospheric contaminants which may be significant in your operations.

Questions pertaining to this subject should be directed to Dr. J. A. Zapp, Jr., Extension 81-3771. Additional copies of this letter and the attachment may be obtained by calling Extension 81-3767.

G. G. MITCHELL, DIRECTOR

Attachment

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