



Air Products and Chemicals
INC.

RECEIVED

NOV 8 1974

Date 6 November 1974

H. A. QUIGLEY

Subject OSHA Standards - VCM and PVC

INTEROFFICE
MEMORANDUM

To A. R. Adams

Valley Forge

(Location, Organization, or Department)

From R. C. Danziger

Valley Forge

(Location, Organization, or Department)

cc: J. T. Barr
S. F. Burke
J. M. Davidson
H. A. Quigley
J. T. Sebastianelli

On 31 October 1974, we had a meeting of the SPI distribution committee task force to discuss the transportation and distribution of PVC and VCM under the new OSHA Standards, due to be effective on 1 January.

Our main purpose was to discuss our mutual problems relative to distribution of PVC and to attempt to come to some uniform decisions on handling of labelling, notification to carriers, etc. No recommendations that were made will be implemented without our respective management's approval.

One of the major areas of discussion was the labelling of bags, pallets, hopper cars, bulk trucks, etc. How, where, types and sizes of labels were discussed in great detail and some agreement was reached among the group. Since, unless a stay is granted, this labelling will have to be accomplished on 1 January 1975. I would like to discuss our conclusions with you or your designee(s) in the very near future.

Another area of major concern is notification of our carriers. It is essential that our carriers, both rail and truck, are made aware of their responsibilities prior to 1 January 1975. In line with this, it was decided that our SPI legal counsel would visit the ATA (American Trucking Association) and the AAR (Association of American Railroads) and explain the standard to them as well as getting their input as to how they plan to proceed. In addition, we are presently drafting up a letter to forward to the carriers. This letter will be discussed at our next meeting and then circulated among our respective management for approval before sending it out. We plan on handling our warehouses essentially the same.

Mr. A. R. Adams
Page 2
6 November 1974

Subject: OSHA Standards - VCM and PVC

If this ruling goes into effect on 1 January, I feel that we will be confronted with two critical situations in Distribution. 1.) In a short period of time, the carriers will push for substantial rate increases for PVC due to the new labelling, and 2.) We may find out that we can no longer ship LTL freight since truckers may refuse to handle it due to the labelling and monitoring requirements.

We are having another meeting on 21 November 1974 in Washington and have invited representatives from all PVC and VCM producers. At this time, we plan to introduce our proposals and come up with our final approach.

Please advise when we can discuss the above, since I would like your input prior to the meeting on the 21st.



R. C. Danziger

RCD:ck

AP00034672