

Vista Chemical Company

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Cost. Response

June 19, 1986

VISTA

Mr. Jeff Almondinger
Plant Superintendent
Northwire
100 Industrial Drive
Osceola, WI 54020

Dear Jeff:

As we discussed, the information below discussed PVC labeling issues and requirements.

Under current regulations, there are two standards which potentially impact PVC labeling, those being the OSHA Vinyl Chloride Standard and the OSHA Hazard Communication Standard.

The OSHA Vinyl Chloride Standard (29 CFR 1910.1017) requires PVC containers to be labeled with a VCM cancer warning label. However, current legal opinion and interpretation of the OSHA labeling requirement is summarized as follows: containers holding PVC product need not carry the OSHA warning label when the handling, transport, or processing of that product could not reasonably be expected to release VCM to the atmosphere which could result in worker exposure to VCM above the action level of 0.5 ppm, eight-hour time-weighted average.

Technical data in the open literature has shown that PVC product containing less than 8.5 ppm residual vinyl chloride monomer (RVCM) will not release VCM in concentrations that could result in exposures exceeding 0.5 ppm, even under adverse conditions of heat and storage.

Based on the above, if your products contain less than 8.5 ppm (RVCM) the VCM warning label would not be required. Vista's PVC Compound does contain less than 8.5 ppm RVCM.

The OSHA Hazard Communication Standard (29 CFR 1910.1200) requires manufacturers to evaluate the hazards of their products, according to OSHA criteria, and among other things label containers of those products determined to be hazardous. There is an "article" exemption in the standard which may apply to your products. Although PVC compound may contain hazardous materials as additives, such as lead, the important issue is whether handling the material under normal conditions of use could create an exposure. Vista's experience in our manufacturing plants is that there is no significant exposure to compound additives when handling the actual compound product. The potential for exposure would be even less

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when handling your finished product. It is Vista's position that our compound products are not hazardous under the Hazard Communication Standard.

Also, I have enclosed a letter regarding the status of PVC under the Hazard Communication Standard, and a copy of the latest OSHA enforcement directive for your general information in developing your plant's hazard communication program.

Please feel free to call me at 713/531-3445 if you have questions regarding the above.

Sincerely,



Thomas G. Grumbles, CIH
Environmental Quality Manager

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cc Winton Gibbons

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