

3-24-74

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PMS MR JOHN H STENDER

ASSISTANT SECRETARY OF LABOR

DEPARTMENT OF LABOR

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BT

WE HAVE CAREFULLY REVIEWED THE "RECOMMENDED OCCUPATIONAL HEALTH STANDARD FOR THE MANUFACTURE OF SYNTHETIC POLYMER FROM VINYL CHLORIDE, MARCH 11, 1974".

OUR CONCLUSION IS THAT WE WOULD BE UNABLE TO COMPLY WITH THE RECOMMENDED STANDARDS AND WOULD THEREFORE HAVE NO ALTERNATIVE BUT TO SHUT DOWN BOTH OF OUR PVC PLANTS, ONE AT CALVEET CITY, KENTUCKY AND THE OTHER AT PAGE, FLORIDA. IN SUCH AN EVENT THE IMMEDIATE AND DIRECT CONSEQUENCES WOULD BE:

- A. A "REDUCTION IN FORCE" OF NEARLY 300 EMPLOYEES.
- B. BETWEEN 200 AND 300 CUSTOMERS WOULD BE WITHOUT OUR SUPPLY OF PVC AND COMPOUND.
- C. NO FURTHER NEED FOR 233,333,333 POUNDS PER YEAR OF VINYL CHLORIDE MONOMER.

WE BELIEVE A SIMILAR SITUATION WOULD EXIST WITH ALL U. S. POLYVINYL CHLORIDE PRODUCERS. OBVIOUSLY THE ECONOMIC IMPACT OF SUCH ACTIONS WOULD BE ENORMOUS.

IN VIEW OF THE TREMENDOUS STRIDES BEING MADE IN THE REDUCTION OF WORKER EXPOSURE, WE STRONGLY URGE YOUR CAREFUL CONSIDERATION OF OUR PREVIOUS RECOMMENDATIONS AND SUGGEST THAT NORMAL RULE MAKING PROCEDURES BE FOLLOWED.

T L CAREY

VICE PRESIDENT, MANUFACTURING
AIR PRODUCTS AND CHEMICALS, INC.

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MAR 21 1974

A. K. McMillan

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