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UNIROYAL, Inc.

Oxford Management & Research Center
Middlebury, Connecticut 06749

October 18, 1974

Mr. Frank T. Ryan
Rubber Manufacturers Association
1901 Pennsylvania Avenue, N.W.
Washington, D.C.

Dear Frank:

You recently sent me a copy of Mr. Schubert's telegram of October 7 to Mr. Lovell. I am sure Mr. Schubert sent it in the best of faith but it reflects certain misunderstandings. I would like to make several points.

Mr. Schubert says "the Hearing Record also supports the conclusion that the vinyl chloride standard is feasible." I suggest he re-read it. He will find that the problem centers in the PVC plants. No responsible representative of a PVC manufacturer indicated that they could reach a TWA of 1 ppm. Many labor representatives and even some scientists with no real knowledge of the industry spoke quite optimistically. The SPI testimony was based on what the industry hoped they could achieve in a reasonable time frame. However, they were talking about much higher levels and at no time suggested they could reach 1 ppm.

We may be able to attain 1 ppm "in most job classifications" since most workers are in fabricating plants where this level is quite possibly feasible. However, this becomes academic if there is no PVC.

There seems to be a concept that since industry succeeded in lowering the concentration from hundreds to tens of ppm in a matter of months, the remaining step can be taken relatively easily. This overlooks the fact that we are confronted with approaching zero asymptotically. As the concentration goes down logarithmically, the cost and difficulty will go up logarithmically. What Mr. Schubert is talking about is completely new plants designed from the ground up with zero exposure as a goal. This will require many years of research and design work. It would be foolhardy to build such computerized, remotely controlled plants without a great deal of pilot plant work. The total cost will be astronomical.

We will grant that Robintech's pipe plants can probably operate at less than 1 ppm. It is a measure of the volatility of the stock market that such a simple statement would cause their stock to go up. It is well known that the stock market is only a reflection of public confidence. The public was not equipped to evaluate a technical statement realistically.

Very truly yours,

W. D. Harris

W. D. Harris, Ph.D.
Corporate Industrial Toxicologist

WDH/mab

bcc: M. J. Kleinfeld R. J. Dowling
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