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January 8, 1986

VISTA

Mr. Gary Franklin
General Manager
PVC Compounders
Division of Lyall Electric
P.O. Box 2000
Kendallville, IN 46755

Dear Gary:

Pat Haugen asked that I respond to your questions regarding PVC Compound labeling 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 5425 Resin 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. I have enclosed a bulletin from The Society of the Plastics Industry regarding this exemption as it applies to PVC. As described in the article, 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

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significant exposure to compound additives when handling the actual compound product. It is Vista's position that our compound products are not hazardous under the Hazard Communication Standard.

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 P. Haugen
E. Kieschnick
J. Friend
F. Tasby

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