

NIOSH CONTROL TECHNOLOGY ASSESSMENT
OF THE PLASTICS AND RESINS INDUSTRY

A CRITIQUE OF THE STUDY REPORT

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I will limit my remarks to the area of polyvinyl chloride, which is the only place I have enough expertise to make any comment. First, the good news. This is not the worst report I have ever seen. That's a compliment, because I have seen a lot of awfully bad reports in the last few years, since the regulatory agencies became active. Some of these reports are a disgrace. This is not one of them. However, it does have some problems. Many of them have already been recognized by the people who put it together, and some of the reasons for these have been touched on. But, to put it briefly, this report didn't do much for me when I read it. There are several reasons for that. It is superficial, it is not critical in its evaluation of what was seen, and it didn't give me anything new. Let's talk about why these things happened.

This is not a problem which is unique to this report. I would say that the study was initiated about 1976 and we are now into 1979, and we're beginning to talk about it. Let's get this done. Why is it so slow? A part of that has to be the fault of the way the contract was handled, first by the funding Governmental agency, and then by the contractor who states he was seriously impeded by the low funding, which was less than one man year, or something like that. It has a date on it of March '78 and here it is February '79. Government moves too slowly to help us. If we wanted help from this document, we would have been in tough shape. It is superficial, because the people who did this work didn't know enough about the industry that they were working with. It is not their fault. They can't look at an industry for that short a period of time and expect to know more than those who have been living and working in it. That's part of the problem. We need to find a way to get better input. That's the principal reason it didn't tell me anything I didn't already know. I wasn't asked to participate in this, but had I been, I wouldn't have told you any secrets, either. There is a financial problem, and there is no way to get around it; that inherently is going to limit the quality of these kinds of reports in the future. I am not going to tell you secrets and you're not going to tell me, and we're going to learn by hiring each other's employees.

Finally, there was very little downstream study done. Again, limited funding, limited opportunity. Despite these difficulties, it seems to me that the recommendations and conclusions that came out of this study were proper. I particularly want to agree with and emphasize several of them.

First, there is no question that retrofitting an old plant is the most serious problem industry has. Given enough time and money, we can build a plant that will do anything. But to try to keep industry in operation is a serious problem. Waiting for the development of a technology that will come some day - how do you keep industry going? Regulations have to approach that problem. The research recommendations, of course, speak to this quite adequately. I want to emphasize that safe work practices are probably the most important part of reducing worker exposure. However, the report did not adequately provide for the place of the operator. The operator can simply make or break any program. He serves as a source of ideas. In our experience with vinyl chloride, the most serious problem we had was convincing those guys that had been there for 20 years that they weren't supposed to have those exposures now. They could see no reason whatsoever why they should pay attention to this new law that interfered with the way they worked. We must get the worker on our side, give them enough education, and if it's there, give them enough scientific basis of the regulation to convince them it is a sound regulation. We do have a little difficulty conveying that idea sometimes. But the worker is extremely important in this, and we must bring him into it. Computer control is another way to minimize exposure. We'll never have zero exposure, but we will have less exposure in the future as the new plants are built with remote operated computer controls; there is somebody sitting half a block away punching buttons; large reactors cut down on the frequency of exposure or pipeline plugging, and when you have to open one and have that unstripped resin streaming out in order to get a pipeline unplugged, you have probably your major source of exposure, rather than pump seal failure. If anybody knows how to do that, it will be a blessing to the industry.

The other major disagreement is that the study has totally ignored the effects of other agencies. One of the reasons it did not receive any better reception in the industry was that in 1976 we had just gone through the first round of OSHA work. We picked a bad time to make a survey on vinyl chloride, particularly when these two agencies, OSHA and EPA are both putting out regulations, as they will continue to do, on the principal organic materials. The cross effects of these regulatory agencies must be understood, and we cannot afford to do the job two and three times. We must do it once.

Finally, I was disappointed that nowhere in the document did I see a mention of the Vinyl Chloride Safety Association. It has been in existence almost ten years. The sole purpose is for the vinyl chloride - PVC people to get together to discuss safety. I think it has done more for safety than any single organization to this day.

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U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Centers for Disease Control
National Institute for Occupational Safety and Health

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CONTROL TECHNOLOGY
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