

Manufacturing Chemists' Association, Inc.

(FOUNDED 1872)

1825 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20009

MAC-55

MEDICAL ADVISORY COMMITTEE

Minutes of Meeting

MCA Offices, Washington, D. C. November 10, 1965

PRESENT

Dr. W. L. Sutton, Chairman	Eastman Kodak Company
Dr. C. U. Dernehl	Union Carbide Corporation
Dr. H. H. Golz	American Cyanamid Company
Dr. R. Henderson (for Dr. M. Gasque)	Olin Mathieson Chemical Corporation
Dr. L. C. Haslam	Canadian Industries Limited
Dr. G. Stopps	E. I. du Pont de Nemours & Co.
Mr. F. G. Stephenson, Secretary	Manufacturing Chemists' Association

GUESTS

Dr. J. A. Calhoun	FMC Corporation, American Viscose Div.
Mr. J. R. Carnes	Manufacturing Chemists' Association
A. H. Christian	FMC Corporation, American Viscose Div
E. M. Dixon	Celanese Corporation of America
Mr. J. Guelich	Allied Chemical Corporation
Dr. E. V. Henson	The Beryllium Corporation
Mr. J. J. Prabulos	National Distillers & Chemical Corp.
Mr. H. F. Smyth, Jr.	Union Carbide Corporation
Dr. N. G. White	Shell Chemical Corporation
Mr. C. J. Windsor	Reichhold Chemicals, Inc.
Dr. J. A. Zapp, Jr.	E. I. du Pont de Nemours & Co.

Dr. Sutton welcomed Dr. Gordon F. Stopps of Du Pont to Committee membership. He welcomed guests who were attending in order to participate in the discussion of Threshold Limit Values as established by the American Conference of Governmental Industrial Hygienists.

1. Threshold Limit Values

The chairman reviewed the activities of the American Conference of Governmental Industrial Hygienists in setting threshold limit values and said the present purpose was to discuss the impact of this activity on MCA member companies.

ACGIH, in publishing Threshold Limit Values (TLV's), fills definite need. The acceptance and adoption of these TLV's by other groups has given a quasi-official status to the ACGIH activity.

ACGIH now publishes a "notice of intent" in which it lists chemicals for which it proposes establishment or revision of TLV's.

During general discussion concern was expressed on the grounds that:

- a) There is insufficient time, after publication of the ACGIH "notice of intent", for companies to gather factual information on employee exposure.
- b) that approximately 15 States have included ACGIH figures in their health regulations.
- c) that industry is put on the defensive in having to present factual evidence to support or refute any proposed TLV.

The chairman then called for comment on a series of questions:

What problems do TLV's, as set by ACGIH, create for industry?

Some members asserted that the establishment of an unrealistically low TLV has an adverse effect on sales of that chemical. However, this problem partially results from misunderstanding of the significance of TLV's and a tendency to use them as mathematical comparisons of toxicity. Unrealistically low TLV's may also have an impact on precautionary labeling. Most importantly, unrealistically low TLV's could result in unwarranted costs of operation, if enforced.

What has been the effect on industry of the adoption of ACGIH TLV's by the States?

ACGIH TLV's have been adopted by some 15 States. It was generally agreed that this has created no problems up to now. State Health inspectors have adopted a very "reasonable" attitude. This state of affairs could change if more or inadequately trained government personnel became active.

Are ACGIH TLV's accurate?

Although we may not agree with them all, they are "pretty good." Primary emphasis has been placed on animal toxicity studies as a basis for the values. The supporting data for any TLV selected has not always been clearly stated by the ACGIH committee.

It was recognized that the viewpoint as to the purpose and function of TLV's has changed. A "comfort" factor has been introduced and there is a tendency to establish values which will produce no effect -- however slight.

It was stressed that in the establishment of a TLV, human data is most desirable and that although a two-year period is allowed after publication of the "notice of intent", companies would be well advised to accumulate data well in advance. This data must be quantitative.

Activities of ASA Z37 Committee

Partly because of slow moving "democratic procedure" by which ASA standards are developed it was not thought likely that ASA standards will ever replace those of ACGIH or that the 8 hour values would be greatly different. The ASA Committee, in addition to developing 8 hour exposure standards, is also considering "ceiling" and "short term emergency" standards.

Activities of American Industrial Hygiene Association

AIHA's offer to participate directly in the ACGIH committee activities had been refused. AIHA is determining emergency exposure levels for some materials. The Hygienic Guides contain TLV's, many of which are the same as ACGIH values, but some do differ, and some are published for chemicals not yet listed by ACGIH.

AIHA is preparing an explanatory "preamble" for guidance of companies using ACGIH values.

Activities of Industrial Medical Association

The Board of Directors of IMA has recommended to the ACGIH Threshold Limits Committee that its (ACGIH) membership should be broadened. However, IMA generally recognizes that ACGIH has done a creditable job. It is thought that no other group could have the same acceptance (for impartiality) and that if industry is to make its proper contribution, companies must keep factual records of exposures in work areas along with medical data on those exposed and be prepared to submit this experience at the proper time.

Activities of MCA Medical Advisory Committee

Dr. Dernehl again advised that the ACGIH will reject company arguments regarding TLV's if these arguments are not supported by factual medical and exposure data. He read a draft prepared as a statement of MCA viewpoint.

The chairman in a review of the discussions concluded:

- (a) that in the establishment of TLV's no other group could effectively replace ACGIH.
- (b) that since ACGIH will accept factual data, industry should make a special effort to obtain such data from human industrial experience and animal toxicity studies.

Mr. Windsor dissented from this conclusion, contending that ACGIH does not welcome contributions; that the imposition of TLV's of a severe nature leads companies into "legal situations"; and that there are currently no standard procedures for the measurement of exposures. Dr. Calhoun supported Mr. Windsor.

The Medical Advisory Committee later agreed to submit a statement of policy regarding ACGIH TLV's to MCA for consideration by the Board of Directors. Comments on a draft prepared by Dr. Dernehl should be forwarded to him by January 12, 1966. Dr. Sutton will forward the final "statement of policy" to the MCA President, together with a letter of transmittal.

2. Membership

(a) It was unanimously resolved to increase Committee membership to 9. This will include 8 U.S. representatives and 1 Canadian representative.

(b) The following were appointed to Committee membership subject to ratification by the MCA Board of Directors.

- 1. Dr. E. M. Dixon, Celanese Corporation of America
- 2. Dr. M. N. Johnson, Monsanto Company

3. Chemical Safety Data Sheet Program

Members agreed to accept responsibility for preparation or review of medical management sections of chemical safety data sheets as follows:

- 1. Paranitroaniline - Dr. Golz
- 2. Zirconium & Hafnium Powder - Dr. Stopps
- 3. n-Butyllithium - Dr. Sutton
- 4. Sodium Cyanide - Dr. Stopps

5. Phosgene - Dr. Dernehl
 6. Methanol - Dr. Dixon
 7. Dinitrotoluene - Dr. Sutton
 8. Dimethyl Sulfate - Dr. Stopps
 9. Calcium Carbide - Dr. Dernehl
 10. Carbon Disulfide - Dr. Haslam
4. Legislation on humane treatment of experimental animals

Mr. P. Hutchinson of MCA Government Relations staff reported on federal bills introduced during the past session of Congress.

It was agreed to prepare a statement of policy on this matter. Dr. Stopps undertook to review the bills and to forward to Chairman Sutton a recommendation for creation of an ad hoc sub-committee to prepare the statement.

5. Next meeting

The next meeting will be held on April 14, 1966 at the Chemists' Club in New York City

Minutes subject to approval

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