



276 - Corp. Safety
THE GENERAL TIRE & RUBBER COMPANY

Corporate Safety Policy Directive

Section: <u>FIRE</u>	Effective Date: <u>MARCH 7, 1977</u>	Number: <u>002</u>
Applicable To: <u>ALL PLANTS</u>	Date Issued: <u>3-8-77</u>	
Execution Responsibility Of: <u>PLANT MANAGER</u>	Supercedes No.: <u>NONE</u>	
Distribution: <u>ALL PLANTS</u>		
Subject: <u>LOCKING OF FIRE SYSTEM VALVES</u>		

PURPOSE

To ensure that water supplies are always available to fire protection systems, General Tire shall now require that fire protection valves at all plants and facilities are locked in the open position. The only times these valves may be closed are during emergencies, systems repairs, tests, and then only as delineated under "Procedures" below.

BACKGROUND

Fire losses attributable to closed fire protection system valves have been increasing in recent years. These valves have been closed, in a large number of cases, by unauthorized persons for reasons unknown. As this kind of loss has continued, all fire insurance carriers have established a policy of insisting that their policy holders lock in the open position all valves controlling water supplies to fire protection systems.

PROCEDURES

The following procedures shall be adhered to in administering the valve-locking policy:

A. Types of Locks To Be Used

Locks shall be of padlock variety (not combination locks) with case-hardened steel shackles. Locks should be capable of being cut with heavy bolt cutters, however, in case the key holder cannot be found in an unusual emergency.

B. Key Holders

The locks shall be keyed to the Corporate great grand master and the plant master system. All locks shall be keyed alike and only the following personnel shall be issued keys for these locks:

1. Plant Safety Engineer
2. Fire Safety Control man or equivalent
3. Plant Superintendent (senior man in plant during night shifts).
4. Plant Guard - key to be kept in guard house and controlled by log with spaces for time out, time in, reason for logging out, and signature of person logging it out. Only the following shall be authorized to log out this key:
 - a. General Manager
 - b. Engineering Manager
 - c. Industrial Relations Manager
 - d. Manufacturing Manager
 - e. Maintenance Superintendent
 - f. Maintenance Supervisor in charge of off-shift.

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LOCKING OF FIRE SYSTEM VALVES

PROCEDURES - continued

B. Key Holders - continued

This locking system is of value only when an absolute minimum number of people are authorized access to the keys and positive key control is maintained.

C. Valves To Be Locked Open

All valves, regardless of configuration, the closing of which would cut off water flow to sprinkler heads in any area, shall be locked open. This includes, but is not limited to, sprinkler riser valves, supply valves between the riser and the main, sectional control valves, public water supply connections, and valves controlling the flow to and from the fire pumps. The following valve configurations are included:

1. Post Indicator Valves (PIV)
2. Wall Post Indicator Valves
3. Outside Screw and Yoke Valves (OS&Y)
4. Post Indicator Valve Assemblies (PIVA)
5. Indicating Butterfly Valves (IBV)
6. Inside-screw Gate Valves

D. Methods of Locking Valves

Valves shall be locked utilizing existing loops or eye bolts, or, as in the case of OS&Y valves, a chain passed through the handwheel and yoke and secured with a lock. When it is necessary to install loops or eyes, these should be welded on rather than bolted. Curb box valve handles and other handles which are stored or hung in a location removed from the valve shall be locked into their hangers. Multiple valves should not be locked together so that unlocking of one valve for an authorized operation will leave an adjacent valve improperly locked.

E. Initial Locking Procedure

Before a valve is locked open for the first time, a drain test shall be run on the sprinkler system controlled by the valve. A rapid rise in pressure in the riser after closing the drain valve will indicate that the supply valve is fully open. After the drain test has been run the valve must again be manually tried to make sure it is still open before being locked.

F. Inspections

1. Until a valve has been locked open it must be inspected weekly with results recorded on the facility's regular fire equipment self-inspection sheet. Once valves have been locked open they must be inspected monthly, again with results recorded.

LOCKING OF FIRE SYSTEM VALVES

PROCEDURES - continued

F. Inspections - continued

2. Once valves have been locked the regular monthly inspection shall consist of visually checking indicator position, screw position, and handle position or location, as appropriate. In addition, the inspector shall actually physically try all valves except the PIVA. (This type cannot be closed if it indicates open). It is important to turn the handle forcefully open, and then close it down a quarter turn to prevent jamming.

G. Curtailment for Repairs or Testing

When it is necessary to shut a valve which is normally locked open, a valve shut "2 Part" card shall be used. The first portion is filled out and displayed on the valve while it is shut. When the valve is reopened and locked, this portion should then be saved by the plant for review upon the next visiting insurance inspector.

The second portion of the valve can be displayed in the office of the person responsible for plant loss prevention while the valve is shut as a reminder of a shut valve. When the valve is reopened and locked, this portion is then filled out and mailed to the Corporate Safety Office.

If it becomes necessary to shut a valve for more than 8 hours or beyond the present work shift, whichever is shorter, it must be reported to the Corporate Safety Department immediately by telephone and followed with a written report.

If it becomes necessary to keep the valve shut for more than 24 hours or during a plant shut-down period (such as a weekend), the Corporate Safety Office should receive prior notification by telephone.

Drain tests shall be performed after the system is back in service to ensure that the closed valve(s) is again fully opened.

H. Valve Closings in Emergencies or after Fires

Valves may, of course, be closed during emergencies at the discretion of the safety engineer, the fire safety control man, and management such as in the case of a fire main break which would have to be isolated by the closure of sectional control valves. Valves must also be shut following extinguishment of a fire which has set off and been controlled by sprinkler heads so that the flow valves may be reset and sprinkler heads replaced. But, management must exercise caution by making sure the fire is completely extinguished before closing off the water supply.

LOCKING OF FIRE SYSTEM VALVES

PROCEDURES - continued

- I. If a situation should arise during which it appears to be necessary to deviate from these procedures, the Corporate Safety Department shall be notified immediately.

- J. Maintenance

Routine maintenance of fire protection control valves such as lubrication, adjustments and other minor service work will not require valve closing notification or valve shut tags. However, if during the course of routine maintenance it becomes necessary to close a valve and keep it closed, then valve closing procedures as outlined in Section G should be followed.

In any event, if during the course of routine maintenance a valve is closed, even momentarily, a drain test should be performed after work is completed and the valve re-locked in the open position.



THE GENERAL TIRE & RUBBER COMPANY

Corporate Safety Policy Directive

Section: <u>FIRE</u>	Effective Date: <u>MARCH 1, 1977</u>	Number: <u>001</u>
Applicable To: <u>ALL PLANTS</u>	Date Issued: <u>3-8-77</u>	
Execution Responsibility Of: <u>PLANT SAFETY ENGINEER</u>	Supercedes No.: <u>NONE</u>	
Distribution: <u>ALL PLANTS</u>		
Subject: <u>WELDING, BRAZING, CUTTING, OR OTHER "HOT WORK" PROCEDURES</u>		

PURPOSE

The purpose of this Standard Practice Bulletin is to establish general procedures to be followed at all company facilities during welding, brazing, cutting, or other "hot work" operations performed in manufacturing areas, as distinguished from permanent welding shops or booths.

SCOPE

This practice is intended to supplement and reinforce written procedures covering the same subject which are currently in force at some company locations, and, therefore, will not in all cases necessitate a change in local practices. Outside contractors, as well as General Tire employees, must adhere to these procedures in order to guard against fire and other hazards normally presented by welding and cutting operations. In addition, conformance with this practice will ensure Occupational Safety and Health Act compliance.

PROCEDURES

Each "hot work" job must be covered by a permit, in the form of a card or eraseable plastic tag, which must be filled out before the job can start and which should remain at the site throughout the job. The permit must be signed by the immediate supervisor of the man doing the work, and by the supervisor in whose area the job is to take place. The permit should be renewed before each shift change, after an extended break in operations or as necessary due to changing conditions at the work site.

The above supervisory personnel should sign the permit only after completion of the following:

1. Personal inspection of the immediate area involved.
2. A check as to training and qualifications of the welder or other employee who is to operate the equipment and the equipment is in good repair.
3. Assignment of a fire watch trained in the operation of first aid fire equipment at the scene. (Necessary for inside jobs; recommended for all jobs.)
4. A test, through use of a combustible gas indicator, for explosive vapors which may be present in hazardous areas.
5. A check to ensure that there is no impairment of fire protection equipment. (Such as work in progress on sprinkler system in area).
6. A check to ensure adequate ventilation, using an oxygen analyzer or gas detector tubes as appropriate, in vessels or confined areas.
7. Removal of combustible materials from an area at least 35 feet from the job.

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WELDING, BRAZING, CUTTING, OR OTHER "HOT WORK" PROCEDURES

8. Shut-down of nearby equipment or processes which could produce flammable vapors, liquid spills, or other conditions likely to affect the safety of the welders or other employees in the area.
9. A check to ensure that sparks produced by the operation will not be carried through ventilation ducts (floor openings, or wall openings) to hazardous areas.
10. Placement of signs, ropes, or warning devices as necessary to protect other employees in the area.

Supervisors should ensure that no welding or cutting is ever done on any closed container or pipeline until it has been thoroughly cleaned and subsequently tested for flammable vapors.

Fire watches should remain at the site for a half-hour after completion of the job to make sure no slow-burning fires have been ignited.

Other action may be required in specific cases, but the above points should be considered prior to every job. The permit itself is designed so that these requirements are listed and can be checked off as completed.

OSHA and other regulations specify maintenance, handling, and storage requirements for welding equipment (gas bottles, etc.) which should be adhered to on a continuing basis and are not within the scope of this practice.



WEEKLY FIRE-PREVENTION INSPECTION

SAMPLE ONLY. NO ONE BLANK CAN BE DESIGNED TO FIT ALL CONDITIONS. USE THIS BLANK AS A BASIC GUIDE IN DEVELOPING YOUR OWN FORM. ITEMS THAT DO NOT APPLY CAN BE OMITTED. OTHER ITEMS CAN BE EXPANDED AS DESIRED. AND NEW ITEMS CAN BE ADDED.

INSTRUCTIONS TO INSPECTOR: FILL OUT FORM WHILE MAKING INSPECTION. SEND COMPLETED FORM TO YOUR SUPERVISOR FOR NECESSARY ACTION. REPORT SHOULD BE HELD FOR REVIEW BY THE NEXT ARM ENGINEER.

PLANT		LOCATION		DATE					
SPRINKLERS	Auto-Matic Sprinklers	ANY HEADS DISCONNECTED OR NEEDED Yes ☐ No ☐		OBSTRUCTED BY HIGH PILING Yes ☐ No ☐					
		HEAT ADEQUATE TO PREVENT FREEZING (NOTE BROKEN WINDOWS, ETC.) Yes ☐ No ☐		Water Pressure	LB. AT YARD LEVEL				
	Sprinkler Alarms	TESTED Yes ☐ No ☐		OPERATION SATISFACTORY (IF "NO" - COMMENT BELOW) Yes ☐ No ☐					
DRY PIPE VALVES	VALVE ROOM PROPERLY HEATED	No. 1 Yes ☐ No ☐	No. 2 Yes ☐ No ☐	No. 3 Yes ☐ No ☐	No. 4 Yes ☐ No ☐	No. 5 Yes ☐ No ☐	No. 6 Yes ☐ No ☐	No. 7 Yes ☐ No ☐	No. 8 Yes ☐ No ☐
		No. 9 Yes ☐ No ☐	No. 10 Yes ☐ No ☐	No. 11 Yes ☐ No ☐	No. 12 Yes ☐ No ☐	No. 13 Yes ☐ No ☐	No. 14 Yes ☐ No ☐	No. 15 Yes ☐ No ☐	No. 16 Yes ☐ No ☐
	AIR PRESSURE	Lbs.		Lbs.		Lbs.		Lbs.	
		Lbs.		Lbs.		Lbs.		Lbs.	
WATER SUPPLIES	FIRE PUMP	TURNED OVER Yes ☐ No ☐		GOOD CONDITION Yes ☐ No ☐					
		AUTO. CONTROL TESTED Yes ☐ No ☐		FUEL TANK FULL Yes ☐ No ☐					
		PUMP ROOM PROPERLY HEATED AND VENTILATED Yes ☐ No ☐		PRIMING TANK FULL Yes ☐ No ☐					
	TANK OR RESERVOIR	FULL Yes ☐ No ☐		HEATING SYSTEM IN USE Yes ☐ No ☐					
TEMPERATURE AT COLD WATER RETURN (SHOULD BE 42°F MINIMUM)		CIRCULATION GOOD Yes ☐ No ☐							
MANUAL PROTECT	EXTINGUISHERS	CHARGED Yes ☐ No ☐		ANY MISSING Yes ☐ No ☐		ACCESSIBLE Yes ☐ No ☐		ATTENTION NEEDED (Give Location)	
	INSIDE HOSE	IN GOOD CONDITION Yes ☐ No ☐		ACCESSIBLE Yes ☐ No ☐					
	YARD HYDRANTS & HOSE	CONDITION NO. 1 NO. 2		NO. 3 NO. 4		NO. 5 NO. 6			
		HYDRANTS DRAINED Yes ☐ No ☐		REMARKS:					
OCCUPANCY	GENERAL ORDER & NEATNESS	GOOD Yes ☐ No ☐		COMBUSTIBLE WASTE REMOVED ON SCHEDULE (PROMPTLY) Yes ☐ No ☐					
	ELECT. EQUIP. FLAM. LIQUIDS	DEFECTS NOTED Yes ☐ No ☐		COMBUSTIBLE DUST, LINT OR OIL DEPOSITS ON CEILINGS, BEAMS OR MACHINES Yes ☐ No ☐					
		SAFETY CANS USED Yes ☐ No ☐		DESCRIBE AREAS NEEDING ATTENTION INCLUDING YARD:					
		EXCESSIVE IN MFG AREAS Yes ☐ No ☐		DRAINAGE OBSTRUCTED Yes ☐ No ☐					
	SMOKING REGULATIONS	LOCATIONS WHERE VIOLATIONS NOTED		VENT FANS ON Yes ☐ No ☐					
	CUTTING & WELDING	PERMITS ISSUED FOR ALL C&W OPERATIONS Yes ☐ No ☐		LISTED PRECAUTIONS TAKEN Yes ☐ No ☐					
	STORAGE	WELL ARRANGED Yes ☐ No ☐		AISLES CLEAR Yes ☐ No ☐					
		ADEQUATE SPACE BELOW SPRINKLERS Yes ☐ No ☐		CLEAR OF LAMPS, HEATERS Yes ☐ No ☐					
	FIRE DOORS	CONDITION		OBSTRUCTED Yes ☐ No ☐		BLOCKED OPEN Yes ☐ No ☐			
	CONSTRUCTION	ANY ACCUMULATIONS OF SNOW, DIRT, ETC. WHICH CAUSE ROOF OR FLOOR OVERLOADING AND COULD LEAD TO COLLAPSE Yes ☐ No ☐		ANY LEAKS IN ROOF AREAS NEEDING REPAIR Yes ☐ No ☐					

VALVE INSPECTIONS

INSPECT LOCKED VALVES AT LEAST MONTHLY. INSPECT ALL UNLOCKED VALVES AT LEAST WEEKLY.

SPRINKLER
CONTROL
VALVES

ALL INSIDE AND OUTSIDE VALVES CONTROLLING SPRINKLERS OR FIRE-PROTECTION WATER SUPPLIES ARE LISTED BELOW. CHECK CONDITION OF VALVE AS FOUND. PHYSICALLY "TRY" GATE VALVES INCLUDING NONINDICATING AND INDICATOR POST GATE VALVES. DO NOT REPORT A VALVE OPEN UNLESS YOU PERSONALLY HAVE TRIED IT. FM APPROVED PIVA'S (POST-INDICATOR-VALVE ASSEMBLIES), IBV'S (INDICATING BUTTERFLY VALVES) AND STANDARD OUTSIDE SCREW & YOKE VALVES DO NOT HAVE TO BE TRIED BUT SHOULD BE VISUALLY CHECKED AT CLOSE RANGE.

NO.	VALVE LOCATION	AREA CONTROLLED	OPEN	SHUT	LOCKED	SEALED
1						
2						
3						
4						
5						
6						
7						
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10						
11						
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18						
19						
20						

THE "VALVE SHUT" TAG METHOD IS USED TO GUARD AGAINST DELAYED REOPENING OF VALVES. GENERAL TIRE VALVE SHUT TAGS SHOULD BE USED EVERY TIME A SPRINKLER CONTROL VALVE IS CLOSED. WHEN THE VALVE IS REOPENED THE 2 INCH DRAIN SHOULD BE FLOWED WIDE OPEN TO BE SURE THERE IS NO OBSTRUCTION IN THE PIPING THE VALVE SHOULD THEN BE RELOCKED.

WERE ANY VALVES OPERATED SINCE THE LAST INSPECTION

Yes ☐

No ☐

WERE VALVE SHUT TAGS USED

Yes ☐

No ☐

WAS THE VALVE REOPENED FULLY AND A FULL FLOW 2 IN. DRAIN TEST MADE BEFORE THE VALVE WAS RELOCKED OR RESEALED

Yes ☐

No ☐

COMMENTS:

INSPECTED BY:

DATE

SUPERVISOR

DATE

GENC 011137



WEEKLY FIRE-PREVENTION INSPECTION

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SPRINKLERS	Auto-Matic Sprinklers	ANY HEADS DISCONNECTED OR NEEDED Yes ☐ No ☐		OBSTRUCTED BY HIGH PILING Yes ☐ No ☐						
	Sprinkler Alarms	HEAT ADEQUATE TO PREVENT FREEZING (NOTE BROKEN WINDOWS, ETC.) Yes ☐ No ☐		Water Pressure	LB. AT YARD LEVEL					
		TESTED Yes ☐ No ☐		OPERATION SATISFACTORY (IF "NO" - COMMENT BELOW) Yes ☐ No ☐						
DRY PIPE VALVES	VALVE ROOM PROPERLY HEATED	No. 1 Yes ☐ No ☐	No. 2 Yes ☐ No ☐	No. 3 Yes ☐ No ☐	No. 4 Yes ☐ No ☐	No. 5 Yes ☐ No ☐	No. 6 Yes ☐ No ☐	No. 7 Yes ☐ No ☐	No. 8 Yes ☐ No ☐	
		No. 9 Yes ☐ No ☐	No. 10 Yes ☐ No ☐	No. 11 Yes ☐ No ☐	No. 12 Yes ☐ No ☐	No. 13 Yes ☐ No ☐	No. 14 Yes ☐ No ☐	No. 15 Yes ☐ No ☐	No. 16 Yes ☐ No ☐	
	AIR PRESSURE	Lbs.		Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.
		Lbs.		Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.	Lbs.
WATER SUPPLIES	FIRE PUMP	TURNED OVER Yes ☐ No ☐		GOOD CONDITION Yes ☐ No ☐						
		AUTO CONTROL TESTED Yes ☐ No ☐		FUEL TANK FULL Yes ☐ No ☐						
		PUMP ROOM PROPERLY HEATED AND VENTILATED Yes ☐ No ☐		PRIMING TANK FULL Yes ☐ No ☐						
	TANK OR RESERVOIR	FULL Yes ☐ No ☐		HEATING SYSTEM IN USE Yes ☐ No ☐						
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	INSIDE HOSE	IN GOOD CONDITION Yes ☐ No ☐		ACCESSIBLE Yes ☐ No ☐						
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		HYDRANTS DRAINED Yes ☐ No ☐		REMARKS:						
OCCUPANCY	GENERAL ORDER & NEATNESS	GOOD Yes ☐ No ☐		COMBUSTIBLE WASTE REMOVED ON SCHEDULE (PROMPTLY) Yes ☐ No ☐						
	ELECT. EQUIP. FLAM. LIQUIDS	DEFECTS NOTED Yes ☐ No ☐		COMBUSTIBLE DUST, LINT OR OIL DEPOSITS ON CEILINGS, BEAMS OR MACHINES DESCRIBE AREAS NEEDING ATTENTION INCLUDING YARD: Yes ☐ No ☐						
		SAFETY CANS USED Yes ☐ No ☐		DRAINAGE OBSTRUCTED Yes ☐ No ☐						
		EXCESSIVE IN MFG. AREAS Yes ☐ No ☐		VENT FANS ON Yes ☐ No ☐						
	SMOKING REGULATIONS	LOCATIONS WHERE VIOLATIONS NOTED								
	CUTTING & WELDING	PERMITS ISSUED FOR ALL C&W OPERATIONS Yes ☐ No ☐		LISTED PRECAUTIONS TAKEN Yes ☐ No ☐						
	STORAGE	WELL ARRANGED Yes ☐ No ☐		AISLES CLEAR Yes ☐ No ☐						
		ADEQUATE SPACE BELOW SPRINKLERS Yes ☐ No ☐		CLEAR OF LAMPS, HEATERS Yes ☐ No ☐						
	FIRE DOORS	CONDITION		OBSTRUCTED Yes ☐ No ☐		BLOCKED OPEN Yes ☐ No ☐				
CONSTRUCTION	ANY ACCUMULATIONS OF SNOW, DIRT, ETC. WHICH CAUSE ROOF OR FLOOR OVERLOADING AND COULD LEAD TO COLLAPSE Yes ☐ No ☐									
	ANY LEAKS IN ROOF AREAS NEEDING REPAIR Yes ☐ No ☐									

VALVE INSPECTIONS

INSPECT LOCKED VALVES AT LEAST MONTHLY. INSPECT ALL UNLOCKED VALVES AT LEAST WEEKLY.

SPRINKLER CONTROL VALVES

ALL INSIDE AND OUTSIDE VALVES CONTROLLING SPRINKLERS OR FIRE-PROTECTION WATER SUPPLIES ARE LISTED BELOW. CHECK CONDITION OF VALVE AS FOUND. PHYSICALLY "TRY" GATE VALVES INCLUDING NONINDICATING AND INDICATOR POST GATE VALVES. DO NOT REPORT A VALVE OPEN UNLESS YOU PERSONALLY HAVE TRIED IT. FM APPROVED PIVA'S (POST-INDICATOR-VALVE ASSEMBLIES), IBV'S (INDICATING BUTTERFLY VALVES) AND STANDARD OUTSIDE SCREW & YOKE VALVES DO NOT HAVE TO BE TRIED BUT SHOULD BE VISUALLY CHECKED AT CLOSE RANGE.

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THE "VALVE SHUT" TAG METHOD IS USED TO GUARD AGAINST DELAYED REOPENING OF VALVES. GENERAL TIRE VALVE SHUT TAGS SHOULD BE USED EVERY TIME A SPRINKLER CONTROL VALVE IS CLOSED. WHEN THE VALVE IS REOPENED THE 2 INCH DRAIN SHOULD BE FLOWED WIDE OPEN TO BE SURE THERE IS NO OBSTRUCTION IN THE PIPING. THE VALVE SHOULD THEN BE RELOCKED.

WERE ANY VALVES OPERATED SINCE THE LAST INSPECTION

Yes ☐

No ☐

WERE VALVE SHUT TAGS USED

Yes ☐

No ☐

WAS THE VALVE REOPENED FULLY AND A FULL FLOW 2 IN. DRAIN TEST MADE BEFORE THE VALVE WAS RELOCKED OR RESEALED

Yes ☐

No ☐

COMMENTS.

INSPECTED BY:

DATE

SUPERVISOR

DATE



The Society of the Plastics Industry, Inc.

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(212) 573-9400

VCM-PVC MANAGEMENT SUMMARY

RECEIVED

FEB 3 1977

Vol. II, No. 1 R. W. Laundrie

ON THE REGULATORY FRONT

Court Grants SPI Intervention in EDF Suit

On December 9, SPI filed a motion with the U.S. Court of Appeals for the District of Columbia asking to intervene in the November 19 petition of the Environmental Defense Fund (EDF) for review of EPA's national emission standard for vinyl chloride ... SPI said any modification of the standard could disrupt and render moot efforts underway to meet strict statutory compliance deadlines set by EPA.

On December 20, the U.S. Department of Justice, which is representing the EPA in the EDF case, filed an Opposition to the SPI Motion to Intervene... Justice alleged that SPI clearly could have filed a petition for review of the regulations if it had done so within 30 days after the regulations were promulgated, and did not do so... hence, Justice said, SPI may not participate as a party to the review proceedings... further, Justice claimed that to the extent the Court of Appeals feels some form of intervention is permissible, SPI's intervention should be strictly limited to those raised by EDF.

On December 29, SPI filed a "Reply of the Society of the Plastics Industry, Inc. to Respondent's Opposition to Motion for Leave to Intervene"... it is expected that the Circuit Court's Motions Panel will meet early in January to rule on SPI's motion... In its reply, SPI emphasized that it has not filed a petition for review and does not intend to challenge the Standard... further that SPI sought to intervene because it was concerned that efforts to modify the Standard could "disrupt and render moot efforts already underway to meet the existing Standard within the strict statutory deadlines imposed by Section 112 of the Clean Air Act"... SPI pointed out it seeks to intervene only to ensure that "this Court will have before it all relevant arguments in support of the Standard and will be appraised of the consequences of any proposed modifications... SPI's Reply also pointed out that the interests of SPI members cannot be adequately protected by participating in the review process as Amicus Curiae (as the Department of Justice suggested in its Opposition Motion).

On December 30, the Court of Appeals granted Motion to Intervene in the case of The Goodyear Tire & Rubber Company and Air Products and Chemicals, Inc... however, the government filed opposition to these Motions, and the Court vacated its previous Order granting the Motions ... on January 18, the Court decided to grant all the pending Motions for Leave to Intervene.

GENC 011140

TOSCA Problems Analyzed

December 15, 1976, Chemical Week article "Toxic Control Law Needs Helping Hand" notes "Chemical Industry will have key role in developing regulations that will determine the direction of control effort and how well it will halt spread of hazardous materials"... notes three things have become clear from current debate over implementation of the TOSCA... (1) Control of toxic substances will become EPA's biggest task within 10 years; (2) Rapid developments in toxicology and epidemiology are needed to come to grips with the law's requirements; (3) The chemical industry is going to play a major role in development of the regulations... quotes Dr. Samuel Epstein, head of the University of Illinois' Department of Occupational and Environmental Medicine (School of Public Health at Chicago) as saying the TOSCA is "one of the most critical measures in the history of preventive medicine in the U.S."

NIOSH Expands Workplace Cancer Program

December 6, 1976, Chemical & Engineering News reported that NIOSH has developed an ambitious three-part program involving surveillance, industry-wide studies and laboratory research to identify and control carcinogens in the workplace... program has been greatly expanded at the prompting of Congress which upped allocation from \$1.8 million in fiscal 1975 to \$6.9 million in fiscal 1976.

ON THE LEGISLATIVE FRONT

In Congress...

Several bills that expired in the last session of the 94th Congress will return early in the first session of the 95th Congress... The Clean Air Act of 1970 actually expired on June 30, 1975 and amendments were killed by a Senate filibuster... funds for the original law are provided through September 1977 so pressure will be heavy to get revision of the act passed quickly... same kind of Congressional thinking applies to Water Pollution Control Act of 1972 which expired June 30, 1975 although its funds are provided through September 1977... since this law gives EPA power to control water pollution there will be a rush to get it extended.

In The States...

More than 40 of the 49 legislatures scheduled to have regular session in 1977 will convene in January ... in New Jersey, according to the December 31, 1976 New York Times, a Senate committee recommended on December 30 that the State Legislature ban 16 cancer-causing chemicals from the State as part of a far-reaching program to cut the high rate of cancer in the State... the committee also suggested that the Governors and Legislatures of New Jersey, New York, Pennsylvania and Delaware form a four-state cancer-control commission to attack environmental cancers on a regional basis... according to the Times, asbestos and vinyl chloride head the list of 16 chemicals the committee recommended be banned in New Jersey.

ON THE TECHNICAL FRONT

New Mammary Tumor Results Reported

According to December 29 Pesticide & Toxic Chemical News, vinyl chloride inhalation tests on rats conducted under contract for HEW's National Institute for Environmental Health Sciences (NIEHS) reportedly have shown induction of malignant mammary tumors at levels down to 50 parts per million... further that none of the tumors appear in control groups which inhaled no vinyl chloride... preliminary results "revealed to Pesticide & Toxic Chemical News by one of the nine Environmental Protection Agency officials" asked to comment on the new Maltoni findings, lend credence, the source revealed, to allegations by EDF that EPA's air emission standard for VCM does not offer adequate margin of safety to people living near plants which emit the chemical.

NEWS BRIEFS

VCM Discovered in Long Island Wells

Tiny amounts of vinyl chloride and other toxic chemicals have been found in water from some public and private wells on Long Island, just east of New York City... VCM was found in only two of 50 wells tested thus far but has received most of the publicity... source of pollution said to be Hooker Chemical Company PVC plant (now closed) but this theory being questioned... New York State legislators up in arms... local health officials have been blamed for alleged failure to act decisively on problem... story has attracted wide press attention in Long Island with some national coverage.

Labor Says Existing Channels Best For Information on Carcinogens

On December 3, Sheldon Samuels, AFL-CIO's director of health safety and environment, said agencies wishing to inform workers about workplace carcinogens and other occupational health hazards should use existing channels of communication rather than invent totally new systems... addressing a symposium in Washington, D.C. on role of public information in prevention of occupational cancer sponsored by National Research Council of National Academy of Sciences, Samuels noted "We need to look at existing structures and develop information tools for peer group leaders in those structures"... stated examples of channels that can be used to disseminate information to workers are voluntary health associations, county health services, community and church programs, and the mass media.

PVC Involved in White House Fire

PVC fumes were labeled the main hazard resulting from a small fire in an auxiliary power transformer room at the White House on December 17... a spokesman for the D.C. Fire Department said PVC fumes are a "continuing problem" in Washington fires... one White House employee required hospital treatment for smoke inhalation... the story received heavy coverage in the Washington press and local radio and television.

ON THE MEDIA FRONT

Massive Cancer Series Runs in Long Island Newspaper

The vinyl chloride industry was given high marks for its clean up effort in the third installment of a massive 14 part series on cancer running in Newsday, a major Long Island newspaper... 'In 1974, when the link between vinyl chloride and a rare liver cancer was established, the plastics industry set in motion a huge clean up campaign,' the article said... SPI Technical Director John Lawrence was quoted extensively as to the industry's commitment and control programs... 'that kind of thinking, that kind of effort, is necessary for the health of the nation and, in the long run, the health of their businesses,' the article concluded.

Industry Critic Praises PVC Control Program

Dr. Jeanne M. Stellman, a frequent critic of health conditions in U.S. industry, used the PVC industry as a prime example of "a job well done" in an article in the November/December issue of Occupational Safety & Health... some of her quotes: "The best example (of successful process control) is vinyl chloride"... "Today, residue (of VCM in PVC resin) is controlled to less than 10 ppm. This virtually eliminates VC monomer exposure among PVC product processors"... "Profits continue to rise (in the resin industry) and future cancers have probably been eliminated."

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