

Interoffice Communication

To S. K. Saborsky
 From T. G. Grumbles
 Date December 20, 1983
 Subject LABELING OF PVC "CONTAINERS"

JJH: ~~AKL~~: TGG: AF
 XF: PVC

Based on the recent industry trend, two legal opinions (one from Keller and Heckman, and one from Michele Malloy, Conoco legal) and the current typical residual VCM levels in our finished product, the OSHA required warning label could be removed from PVC containers.

However, the following items need to be considered and resolved before the decision is made.

1. Based on BF Goodrich's extensive technical work, including emissions modeling, the product must contain less than 8.5 ppm RVCN to present no potential for emissions to create exposures greater than 0.5 ppm. The most recent product data I have still lists a specification of less than 10 ppm RVCN for Conoco resin and 5.0 ppm for dry blend. Can these numbers, in particular the resin number, validly be lowered in our technical information?
2. Would we do a customer notification similar to Goodrich? If so, we would have workplace monitoring from Aberdeen for reference but I am not aware of any other recent RVCN measurement data on our products.
3. The potential product liability "protection" of the warning label should be considered and discussed with legal and plant management. My experience, based on customer inquiries about the warning label, would say that the positive benefits of removing the labels would be greater than the potential protection the label gives us, as long as we are technically sound in our knowledge of RVCN levels.

Current practice at Aberdeen is to tag hopper cars and label the bags. OKC does not tag hopper cars. Let me know when you would like to discuss these items.

Tom G. Grumbles

TGG/akh

cc: ELK, JJH, SLL