



B. F. Goodrich Chemical Company
A DIVISION OF THE B. F. GOODRICH COMPANY

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INTERNATIONAL DEPARTMENT

March 21, 1974

VIA AIR MAIL

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Gentlemen:

Enclosed is another transmittal relative to the VCl exposure problem. Included are the following:

- 1) Internal BFGC Notices regarding medical research at the University of Louisville and an OSHA hearing.
- 2) News articles from the Louisville Courier-Journal, Louisville Times, Wall Street Journal, and Occupational Hazards.
- 3) Copy of comments regarding NIOSH recommended health standards for the PVC industry. Of especial impact, the final sentence, "In our view, the health standards recommended by NIOSH if adopted would shut down the PVC industry and downstream manufacturers."
- 4) Liver functions testing protocol. The word abnormality is subject to variable interpretation by the medical people, who have occasionally considered some test results as being so close to normal as not to warrant further testing. Such variability may be inescapable at this stage of our experience with the VCl exposure problem, but it is a serious factor which can lead to false impressions. For example, it can make one plant appear to be several times worse than another. Thus, the test results must be kept confidential among your highest management.
- 5) Summary of Prof. Maltoni's animal experimental program. Per Maltoni, one year in a rat's life equals 15-20 years of human life, but of course, that is not 100% true - only a guideline.
- 6) Minutes of March 8th meeting of Ambient Vinyl Chloride Standards Committee.
- 7) Miscellaneous reports of OVA readings from USA plants.
- 8) Residual VCl content of finished PVC products.
- 9) Reports about implementation of NIOSH recommendations in our USA plants.

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- 10) ALGC permanent procedure for the Bendix Total Hydrocarbon Analyzer.
- 11) An analytical system for measuring the adsorption of VCM on charcoal.

A March 15th Plant Managers' Meeting produced many interesting comments about the exposure problem. Some of them are paraphrased in the above list; others which stand out in my mind are outlined briefly below.

Our code zero work has been organized to reduce to a minimum (zero whenever possible) exposure to VCl. The task force, headed by Fred Krause, has taken these several approaches:

- 1) High conversion resins to minimize recovery operations and their concomitant losses of VCl.
- 2) Closed polymerizers; that is, never open them for cleaning.
- 3) Post polymerization operations, including improved methods for removal of unreacted VCM.
- 4) Analytical detection of VCM.

Work practices are proving difficult to specify in some respects - not unexpectedly. Use of rubbers and impervious outer covering is a typical case in point, as rubbers can lead to foot fungus, and the outer covering can be very uncomfortable in hot, humid climates.

The OVA is inaccurate at 10 ppm and less, due to its background noise, i.e. its registry of organic vapor when actually none is present. That characteristic is under investigation intended to eliminate it. The Bendix should be accurately sensitive to much lower amounts of organic vapor.

Sincerely,



J.M. Hyslop

JMH:jmo

Encls.

cc: R.P. Kenney/A.L. Hatfield/L.M. Puckett/R.D. Savage ✓

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