



INTERNAL CORRESPONDENCE

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CHEMICALS AND PLASTICS

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To (Name) Mr. G. R. Kraft

Division

Location Institute Plant

Date January 30, 1974

Originating Dept. Chemicals and Plastics Safety

Copy to Mr. T. W. Carmody
Mr. W. A. Gay
Dr. E. Q. Hull
Mr. A. Walker
Mr. D. L. Wiley
Plant ManagersSubject ~~Proposed~~ Carcinogens
Policy Statement

PLAINTIFF'S EXHIBIT

UC-P-8

Thank you for the summary of the comments received from the plants regarding the proposed policy for carcinogenic materials. This letter is intended to answer questions arising from the meeting.

The purpose of the policy statement is to ensure that action is taken in the eleven areas of concern listed in the policy. The policy does not attempt to define specific actions. Each carcinogenic material would be handled according to the hazard involved and the specific circumstances under which it is produced or otherwise handled.

We have had a system for identifying carcinogenic materials for many years. The problem is to have a plan of action once identified. The system for identifying carcinogens is, and will be essentially, that R/D requests Mellon Laboratories to run toxicological data on all new products. Toxicologists and the Medical Department, based upon the data and behavior of similar chemical structures, can define the degree, and type, of activity to be expected. The Medical Department will then define exposure limits. Once the limits are established, appropriate monitoring techniques can be specified.

In reference to clothing, the policy requires "adequate clothing and protective equipment." If the material is completely enclosed in the process, no special clothing may be required. If the material is a hot residue being drummed, or a dusty material, special clothing must be specified.

The requirement to isolate the area may mean enclosing a grinder, or putting a fence around an entire department. The intent, of course, is to prevent contamination of other areas, and prevent casual access to the hazardous area.

Medical surveillance will depend upon specific potential of exposure. In any event, medical programs will become more extensive than in the past if we are to be certain that employees are not being over-exposed to toxic materials.

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