

Manufacturing Chemists Association

OCCUPATIONAL HEALTH COMMITTEE

Minutes of Meeting

MCA Conference Room

Washington, D.C.

December 16, 1975

Chairman Christofano convened the meeting at 8:30 a.m.
The record of attendance is:

MEMBERS PRESENT:

W. V. Andresen	American Cyanamid Company
E. E. Christofano	Hercules Incorporated
D. L. Eynon	Koppers Company, Inc.
W. S. Ferguson	Allied Chemical Corporation
R. D. Fulwiler	The Procter & Gamble Company
J. W. Hammond	Exxon Company U.S.A.
M. N. Johnson	The B. F. Goodrich Company
S. C. Kelton	Rohm and Hass Company
C. S. Laubly	Celanese Corporation
P. Lubs	BASF Wyandotte Corporation
(for E. J. Kerfoot)	
W. A. McClellan	Gulf Oil Corporation
R. L. O'Connell	Olin Corporation
(for M. R. Gasque)	
C. F. Reinhardt	E. I. du Pont de Nemours
M. Freifeld	MCA Staff

GUESTS PRESENT:

M. G. Decerbo	Borg-Warner Chemicals
E. Q. Hull	Union Carbide Corporation
W. M. Smith	Air Products and Chemicals, Inc.
J. C. Zercher (part-time)	MCA Staff

MEMBERS ABSENT:

J. Bolton	Stauffer Chemical Company
L. E. Cassidy	Canadian Industries Ltd.
K. R. Doremus	Merck & Co., Inc.
L. B. Grant	PPG Industries, Inc.
W. C. Janes	U.S. Steel Corporation
G. J. Levinskas	Monsanto Company
J. E. Long	3M Company
F. L. Lyman	CIBA-GEIGY Corporation
J. R. Venable	Dow Chemical U.S.A.

1. Minutes of Last Meeting

Minutes of the October 7, 1975 meeting were approved as distributed.

2. Health and Standards Subcommittee Report2.1 Comments on Standards Completion Project (Mini-Standards)

A draft of comments on the SCP Set B and cover letter by Mr. Warren Ferguson, December 5, 1975, were distributed. Its thrust is to question the need for the Project to begin with and to object to the approach taken in its implementation. Issue is also taken with the uniform "action level" at 50% of the permissible exposure level. In this connection, the Secretary distributed copies of the AIHA (American Industrial Hygiene Association) position statement disagreeing with the entire concept of the "action level". To further support Mr. Ferguson's contentions, the Secretary cited a paper on "Environmental Monitoring Programs in a Big Industry Setting," presented by Howard L. Kusnetz, Manager, Manufacturing-Safety and Health, Shell Oil Company, at a symposium December 9 sponsored by the American Conference of Governmental Industrial Hygienists in Cincinnati. Copies will be distributed to the Committee and attention is drawn particularly to the last four pages.

Although the draft comments apply to the entire SCP, Mr. Ferguson proposed that they be presented at the hearing for Set B, scheduled to be held next, but not yet announced. The docket for Set A has been closed. The Committee endorsed Mr. Ferguson's suggestion that a work group be formed to prepare a statement for oral presentation along the lines of his draft. (The Secretary

has since been advised by counsel that it would be desirable to submit written comments in response to the proposed Set B prior to the deadline of January 15, 1976, since there is no guarantee a hearing will be held at all. This was done. Any additional background material, such as the Kusnetz paper cited above and the talk presented recently by Mr. Ferguson, was also solicited.

Mr. Hammond was appointed Chairman of the work group and Dr. O'Connell agreed to be a member. Nominations for additional participants should be directed to the Chairman. A target of mid-January was proposed for an initial meeting of this group.

In this connection it was also mentioned that Mr. Charles Maddock of Hercules was recently designated by the Legal Advisory Committee as the liaison person for OHC.

The Secretary summarized the status of SCF drafts issued as follows:

<u>SET</u>	<u>NUMBER OF SUBSTANCES</u>	<u>FEDERAL REGISTER DATE, 1975</u>
A	6	None issued
B	8	January 27
C	11	February 3
D	15	March 14
E	15	April 21
F	11	July 8
G	10	November 4
H	8	November 4
I	12	November 20
J	<u>10</u>	November 20
	106 TOTAL	

2.2 Salt Water as Emetic

After further discussion and review of the arguments presented at previous meetings, the Committee voted unanimously

to recommend the removal from MCA literature of the statement on the use of salt as an emetic. Instead the phrase "induce vomiting" was proposed.

2.3 NIOSH Letters with Background on Specific Chemicals

"Dear Colleague" letters from Dr. Lloyd of the National Institute for Occupational Safety and Health supplying information and sometimes asking for data on certain chemicals such as polychlorinated biphenyls were brought to the group's attention as a matter of interest. No specific action was thought to be necessary.

3. Revision of Safety Data Sheets (SDS)

The SDS for hydrogen fluoride is the only one of immediate concern for the Committee and has been referred to Drs. Venable and O'Connell for action. Other SDS' requiring revision at this time, including vinyl chloride, trichloroethylene, and ethylene dichloride have been referred to the Technical Panels concerned with these projects.

4. Proposals for Fiscal 1976 Budget

The funding of special MCA projects was reviewed by the Secretary as including preparation of a proposal in a final form by the end of January for presentation to the Finance Committee, then the Executive Committee and finally to the Board of Directors. Each year the budget, taking effect June 1, is usually finalized by the time of the Board's April meeting.

The proposed joint mortality study of petrochemical workers with API (American Petroleum Institute) was reported by the Secretary to have been discussed, but not formally presented for action, at the last Executive Committee meeting. The staff recommendation was to seek Executive Committee approval in principle for the project at a future meeting with funding to start June 1976. Although this project has been sketched by API only in broadest outline, so far, to permit incorporation of MCA suggestions, it was felt additional detail was needed before presentation to the Board. With the above time frame in mind, formation of a working group (note: Drs. Hull and O'Connell have since agreed to serve) to meet with API counterparts by mid-January was agreed on. Proposals for candidates should be directed to the Chairman.

Mr. Christofano expressed the opinion that too much emphasis was being placed by regulatory agencies on health effects of chemicals. A questionnaire to be completed by MCA members was proposed to help

establish a data base on the health effects of chemical exposures in the workplace. A prospective morbidity study was favored for this purpose and Dr. Reinhardt suggested calling on experts to help determine the scope of such a project. Dr. Kelton was appointed Chairman of the work group and Mr. Lubs agreed to contribute. The Secretary was asked to try to obtain a copy of a Tabershaw/Cooper Associates report which was prepared for API on a feasibility study of morbidity in petroleum workers.

Another suggested proposal was establishment of a tumor registry via a contractor. Drs. O'Connell and McClellan agreed to contact potential contractors. It was also suggested that the opinions of appropriate people at the National Cancer Institute be sought on the subject.

5. Liaison Activities

5.1 Safety and Fire Protection Committee

Mr. Zercher, Secretary for this Committee, reported that discussions with the Canadians are continuing and holding the annual joint workshop in that country remains a strong possibility. The Occupational Health Committee expressed interest in co-sponsoring this activity once more along with S&FPC and Dr. O'Connell was requested to ask Dr. Gasque whether he would again be the liaison person for this activity. A suggested topic for the workshop was on legal aspects of occupational health practice.

The intent of S&FPC to change the industrial injury experience reports they publish was described by Mr. Zercher. Currently they are based on ANSI (The American National Standards Institute) Z-16 guidelines. Many companies have been backing away from the voluntary Z-16 format since OSHA reporting on the same subject is mandatory. It was also noted that S&FPC is considering incorporation of non-work related health data in their reports. (It has since been decided this type of data could not easily be broken out and reported separately.)

The use of photochromic lenses in safety glasses was disapproved by S&FPC, Mr. Zercher reported, since they are (a) inadequate in bright sun (b) impact resistance is questionable, and (c) response time is too slow when entering dark areas. The Occupational Health Committee concurred in this view. However, Chairman Christofano suggested that OHC may want to set-up a working group to look at proposed protective equipment.

With regard to attendance of OHC liaison people at S&FPC meetings, Mr. Christofano intends to be at their March 2 meeting in

Wilmington, Delaware, but others were invited to attend. It should be an especially interesting one since it is being combined with a presentation by du Pont March 1 on safety in transportation. It was also noted that their June 15 meeting is now scheduled for Washington.

5.2 Chemical Industry Association (CIA)

The British have proposed a seven to ten day meeting in the United Kingdom with British legislation as the theme. S&FPC, by Mr. Zercher's account, would prefer to limit the meeting to five days at most and devote no more than one day to British legislation with the balance on topics of mutual interest.

None of the Occupational Health Committee members present could commit themselves to attending such a meeting but felt OHC representation would be desirable hence, recommended that either the Chairman, Vice Chairman or Secretary be present.

5.3 American National Standards Institute

Mr. Christofano contacted the Chairman of Z-37 and was assured we will be notified of meetings of this group.

The Secretary raised the question of whether this Committee would want to be represented on Z-62 "Uniform Industrial Hygiene Standards". Some years ago Dr. Dernehl of Union Carbide was the representative but there was doubt about whether the Committee is still active. Dr. Hull agreed to investigate this.

6. Membership

The Committee voted unanimously to recommend to the Board that Mr. Decerbo and Dr. Hull be approved as members.

7. Reduction of Recordkeeping for Government

7.1 Commission on Federal Paper Work

The Secretary outlined a discussion with Mr. C. C. Candee, retired executive from Chemetron Corporation, who was asked to serve on this Commission. The program for the Commission has not yet been defined. The objective of cutting down paper work is recognized as laudable but the possibility of achieving it seems remote. The Commission's director, Hassell B. Bell, proposes a three-pronged approach as follows: (1) an office of advocacy to reflect viewpoints

of affected publics (2) research programs, and (3) study groups for specific agencies such as the Internal Revenue Service.

Mr. Candee would like to have the Committee's comments before deciding whether to volunteer his time. There was a general expression of interest in the project and a resolve to cooperate when requests are made to perform specific tasks.

7.2 The Fertilizer Institute (TFI)

Some anomalies and requirements for extensive recordkeeping in the proposed OSHA regulations for ammonia and sulfur dioxide were discussed. Since MCA does not usually comment on pending government action on individual chemicals, unless broad issues are involved, the Committee did not take any specific action. In this connection, Mr. Ferguson suggested that the Board be asked whether they want to have MCA take positions on single chemicals. The Secretary mentioned that TFI is vitally interested in these two materials and is planning vigorous action on them. The contact there is Mr. Ben F. Day, telephone (202)466-2700. The Committee asked the Secretary to keep in touch with this organization so progress can be reported.

8. Legislative Subcommittee

Dr. Johnson said action on the Toxic Substances bills is scheduled for early in the next session of Congress.

He also reported that a bill to modify OSHA by providing on-site consultation had passed the House and would probably not pass the Senate.

Congressman Obey is displeased with the way the OSHA act is being administered. He feels more emphasis should be placed on serious hazards, as opposed to the less significant ones being highlighted.

9. Paper on Epidemiology

The Secretary reported Dr. Gaffey's draft of a paper on "A Brief Overview of Occupational Epidemiology" had been received and would be sent to the Committee for comment and approval.

10. Next Meeting

March 16, 1976 at 8:30 a.m. is the date set for the next meeting in Washington, D.C.

The meeting was adjourned at 1:30 p.m.


Milton Freifeld
Secretary

Minutes Subject to Approval

MF/mj
2/2/76