



Shell Oil Company
Interoffice Memorandum

FEBRUARY 11, 1980

RECEIVED
H.S. & E. SUPPORT
INFORMATION SERVICES
FEB 12 8 30 AM '80

V. K. K. K. K. K.

FROM: J. E. BERGER
TO: D. K. SPENCER
SUBJECT: SPI'S PVC SAFETY GROUP - STEERING COMMITTEE

In response to your request I attended the SPI's Polyvinyl Chloride Safety Group meeting as your delegate on February 8, 1980. An attendance list is appended, and topics addressed by the Committee are summarized below.

1. OSHA's December 18, 1979 Request for Information

In response to an SPI petition, OSHA extended the PVC/VCM comment period to May 9, 1980 from the original deadline of February 18 stated at 44 FR 74928. Based on conversations with Peter Infante and J. K. Wagoner of OSHA, SPI counsel Joe Hadley believes that OSHA has a hidden agenda not stated in their Federal Register request of December 18. In particular, Infante and Wagoner have indicated to Hadley that they believe PVC dust per se is a carcinogen. Hence, Hadley speculates that OSHA probably will begin rulemaking on PVC dust exposures during the autumn of 1980; he speculates further that OSHA will attempt to reduce VCM occupational exposure limits at the same time.

During lengthy discussion a consensus developed that SPI should reply to the OSHA request for information with the minimum response consistent with a spirit of genuine cooperation. This measured response is based on the belief that the information sought by OSHA either exists in the open literature, exists in prior submittals, or does not exist at all. SPI members are unaware of compelling new or unpublished data on VCM or PVC and therefore the committee decided to postpone a detailed response until OSHA reveals its data and position during the March 20-21 seminar on these topics. Our data base on PVC dust is sparse, however, and needs further effort to collect and review relevant literature (see following topic).

2. OSHA's March 20-21 Seminar on PVC/VCM

OSHA's Infante is organizing a PVC/VCM symposium scheduled for March 20 and 21 in Bethesda; about 36 papers will be presented. SPI representatives or members will present several papers: a Dow employee will rehash their 1977 epidemiology study of VCM workers, Wheeler of Union Carbide will discuss engineering controls, and consultant Clark Cooper will present a previously-published epidemiology study by Equitable Environmental Health Associates. Other papers volunteered

by SPI (e.g. angiosarcoma registry, birth-effects study) were rejected by symposium organizers. Maltoni will present a paper although his contribution probably will not be available to SPI members prior to the meeting.

The "Epidemiology Study of Respiratory Disease in Workers Exposed to PVC Dust", published October 1979 by the Institute of Occupational Medicine (Edinburgh), will be presented. This study of 818 employees (sponsored by I.C.I.) is regarded generally as a good-quality investigation despite the fact that it focused unavoidably on personnel exposed to "old-technology" PVC resins which contained higher VCM residues than do today's polymers. Although the study failed to demonstrate conspicuous adverse health effects due to PVC dust, it did show modest reductions in pulmonary function (FEV and FVC) equivalent to about one-seventh the reduction caused by aging.

An analysis of the PVC-dust paper, and a response to it, is needed urgently by SPI. Complicating this issue is the fact that health effects due to airborne dust have not been studied exhaustively -- it is not known whether PVC dust is more harmful than other "nuisance" dusts. Torkelson of Dow will develop a program for bibliography acquisition with particular emphasis on PVC dust and on the 175-180 relevant papers on VCM and PVC acquired from OSHA by SPI's counsel. This OSHA collection of papers is the foundation for their December 18 request for information.

SPI's strategy for the March PVC/VCM symposium includes (1) tape-recording the proceedings and photographing all slides, (2) transcribing key papers, (3) having two U.S. and two European expert consultants available for rebuttal of papers deserving refutation, (4) having public relations experts on hand to assist with news media matters should such needs arise, and (5) preparing a critique of the symposium for use as an SPI response to OSHA's December 18 request for information. For these purposes and for initial steps in bibliography acquisition, Ted Torkelson (Dow) was named coordinator and authorized to use up to \$25,000 of SPI resources.

The Safety Committee will convene shortly after the March 20-21 PVC/VCM Symposium to discuss further actions.

3. Emergency VCM Releases

Collection of emergency release data was characterized by SPI counsel as "going well"; the trend in such emissions is downward. EPA activity in this area is slowing down, due in part to the Hooker-Tenneco litigation. Gary Baise speculated that EPA would assign a low priority to emergency discharges of VCM were it not for Environmental Defense Fund prodding.

4. Finances

The PVC Safety Committee is broke. Calendar 1979 expenditures were \$251,551 of which 75.5 percent went to Keller & Heckman for legal expenses and 22.1 percent went to Hill & Knowlton for public relations. Lately, expenses have averaged \$23,000 per month; the Committee's January 1, 1980 balance was \$2,200.

A \$200,000 assessment passed without a dissenting vote: it was predicted that this assessment will last until June 1, 1980. For reference, two identical assessments of \$103,843 each were levied March 22, 1979 and July 12, 1979. Shell's share for each of these two 1979 assessments was \$11,840.

5. Miscellaneous

The APME representative reported that some European unions are demanding early retirement and shorter work-weeks for employees who work with actual or suspected carcinogens. The PVC Safety Committee will meet in regularly-scheduled session on April 30 in Washington in conjunction with the SPI's scheduled meeting.



JEB:hmm

Attachment

cc: R. D. Mullineaux
B. F. Aurelius
R. L. Brunner
P. W. DeLeeuw
G. L. Greene
R. E. Joyner, M.D.
C. D. Kary
V. L. Kirkland
H. L. Kusnetz
R. J. Reynolds
C. E. Stehr
D. E. Stevenson

PVC SAFETY COMMITTEE MEETING

February 8, 1980

Attendance List

A. Ross Adams	Air Products & Chemicals
E. J. Baier	Diamond Shamrock
Gary H. Baise	Beveridge, Fairbanks & Diamond
William Becker	B. F. Goodrich
Jerry Berger	Shell
R. B. Downey	B. F. Goodrich
J. E. Ertel	Pantasote
James J. Hall	Conoco
Joseph E. Hadley	Keller & Heckman
M. N. Hohnson	B. F. Goodrich
R. W. Laundrie	General Tire & Rubber
John R. Lawrence	SPI
C. W. Montgomery	Ethyl Corporation
Robert C. Sander	Air Products & Chemicals
S. W. Schaefer	Diamond Shamrock
M. M. Swetonic	Hill & Knowlton
* Jean Claude Thomas	A.P.M.E.
T. R. Torkelson	Dow Chemical USA
R. M. Walter	Firestone Tire & Rubber
T. C. Walker	Firestone Plastics

*Accepted February 8, 1980 for membership on the Steering Committee as the liaison from A.P.M.E. (European Association of Plastics Manufacturers).