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## Interoffice Communication

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FROM: S. K. Saborsky, E. L. Kieschnick

Copy: \_\_\_\_\_

DATE: June 12, 1984

SUBJECT: LABELING OF PVC CONTAINERS

PVC  
File: IndefiniteX-F: 7/20

We have formulated, with Environmental, the following tentative plan concerning the cancer warning labels on PVC containers. Outlined at the end of the letter are the action steps necessary to finalize the labeling decision.

### Background:

In accordance with OSHA and EPA standards, all PVC companies have been placing a cancer-suspect warning label on all PVC containers. However, in the last several years a majority of companies have dropped the labels, based on various legal opinions (Keller & Heckman, etc), when the possibility of triggering the 0.5 ppm OSHA action level does not exist.

Based on this information, the PVC Business Area and the Environmental department have formulated the following plan.

### Recommended Plan:

- (1) Remove the cancer label from all gaylords and compound bags (C-2 and C-4).
- (2) Remove the cancer label from all bulk trucks and railcars of compound, dryblend and 5385-I, 5385-III, 5425, and 5465.
- (3) Remove the cancer label from all export bags and specify 8.5 ppm RVCM on all resin shipments to Hayes Dockside.
- (4) Keep the cancer labels on all Aberdeen resin bags (C-5, C-6) and all bulk trucks and railcars of 5305, 5265, and pond resin.
- (5) Work toward achieving an 8.5 ppm RVCM on 5265 and 5305 for eventual label removal.

### Action Steps:

Before we can proceed with the above plan, several issues must be addressed and resolved. The following action steps are designed to provide adequate background information as well to assure that the plan is workable and feasible.

- ABD-LPS/JRW (1) Contact T. G. Grumbles to define what historical RVCM  
OKC-RP information is necessary to support an 8.5 ppm level  
in 5385, 5425, 5465, sifter overflow, BB's and  
resifted sifter.

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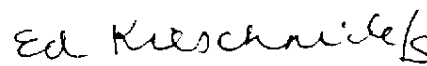
- BEAL/DRP/RML (2) Is it possible to print C-2 and C-4 bags without the label and C-5 and C-6 bags with the label - that is, do they make separate printing plates for each size bag?
- NCF (3) Does the cancer warning label provide liability protection even though the label is not required?
- JF/CRM (4) Is there an administratively foolproof ~~system~~ to label 5305, 5265 and pond resin cars and trucks and not label all other shipments (i.e. print label on the back of only the 5305, 5265 and pond resin tags)?
- DFHo/LPS (5) Is an 8.5 ppm RVCM limit on 5305 and 5265 railcars shipping to Hayes Dockside (12 R/C's per year) workable (i.e. lot selection)?
- SEM (6) Is an 8.5 ppm RVCM limit on the specifications for all dryblends, compounds, and resins (except pond resin, 5305, and 5265) acceptable to the product specification committees.
- RES (7) Will removing the cancer labels (without fanfare or formal notification) result in a marketing problem which is difficult to handle?
- TGG (8) Issue to SKS and ELK documentation supporting the above plan.

In order to proceed in a timely fashion, please respond to me (if you haven't done so already) no later than June 20th.

Once all of the information is assembled, I will issue the final plan for signatures by all necessary persons.

Please call if you have any questions.

  
Steve Saborsky

  
E. L. Kieschnick

smb

Distribution: HDG, RP, JF, CRM, DFHo, PJH, LPS, JRW, SEM, HJH, RES, ELK, MAS, BEAL, DRP, NCF, RML, TGG, JJH, JHMc

cc: RDG, HRF, CMS, DHS, FLT

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