



*General P6-164
BB delivery - Info packets*
B. F. Goodrich Chemical Company

A DIVISION OF THE B. F. GOODRICH COMPANY

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INTERNATIONAL DEPARTMENT

VIA AIR MAIL

August 5, 1974

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Gentlemen:

The OSHA Hearings were held the weeks of June 24 and July 8. There were 44 individual pieces of testimony, mostly by industry, but also considerable number by union representatives and government agencies. Following the hearings, we were informed that the OSHA committee will accept any additional information up until August 23, 1974. OSHA also contracted with Booz, Allen and Hamilton to conduct a survey determining the cost of meeting various levels of exposure. PVC producers are contributing data to this survey. This information is also to be submitted by August 23. In addition, NIOSH is sponsoring a survey of monomer producers and PVC fabricators. The timing is that a new standard is supposed to be enacted by October 5, according to the Law. However, a 30-day notice published in the Federal Register would have to meet a deadline of September 5. There is some feeling that this deadline might not be met and that the U.S. standard would not be in effect until perhaps November.

Because of the industry's testimony that a zero detectable standard is neither attainable nor justified, plus the effort by OSHA to determine the costs of meeting various exposure levels, there is certainly some hope that the standard will not be zero, but some fairly low level of exposure, such as 10 or 20 ppm TWA (time weighted average).

The OSHA health crisis is certainly dominating all of our Company activities. Most of our R&D and production technical people are concentrating on some phase of reducing the VCM exposure. I have heard some informal estimates that the 50 ppm standard now in effect is costing us about a 5% loss in production, that a 25 ppm TWA ceiling would probably increase this to 10%, and a 10 ppm TWA ceiling would be somewhat higher. Some of the Plants, especially Louisville, are having some problems with staffing because of a constant barrage of input from the media, the need to displace some people from their regular jobs, and the general concerns leading to morale problems. I certainly hope that answers to many of these concerns can be developed and put into operation before the situation reaches the same proportions in countries other than the U.S.

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The work being done by the R&D faction with considerable cooperation from the plant technical people is concentrating on, 1) Polymerization chemistry and reactor surfaces, with the hope of minimizing cleaning and reducing the frequency of opening vessels, and 2) Work in the post-polymerization area, with the objective of reducing the free VCM in the slurry and subsequent parts of the process, which could have a beneficial effect both on our plant exposure and environmental problems as well as on our customers downstream.

The information contained in this transmittal is as follows:

1. Statements by A. Vittone, P.J.Weaver, R.W.Strasburg, and Dr. M.N.Johnson, presented at the OSHA Hearings on behalf of the Society of the Plastics Industry's Committee of Vinyl Chloride Monomer and Polyvinyl Chloride Products. Also included are additional statements by John L. Nelson and Dr. C. Moore of the University of Louisville School of Medicine, on behalf of B.F.Goodrich Chemical Company. Also included are statements of Arthur A. Smith, of Rob-intech, Incorporated, and Rodney P. Becker of Diamond Shamrock Chemical Company. This testimony in total contains a great deal of data relative to what is being done in the U.S. PVC Industry to reduce VCM exposure. I especially want to point out the data presented in Phil Weaver's testimony relative to the work that was done in a wide variety of PVC processing plants. This data might well serve to reassure some of your customers that the VCM exposure in these plants can be kept at a very low level, close to undetectable.
2. Minutes of the VCL Usage Efficiency Meeting held on July 15 and 16 at Pedricktown. Efficiency and reduction in exposure go hand in hand these days, and I believe there are a number of ideas contained in these minutes which might be helpful to your plant people.
3. The Analytical Procedure presently being used for personnel monitoring. I promised to include this procedure previously. The analysis of the carbon trap samples is still a rather complex procedure. All this work was being done at Brecksville, and only now are efforts being made to transfer the work to the plants. I might add that the VCL Standards Committee made a decision to continue gathering building exposure data with the hope that we can eventually reconcile personnel monitoring data with these data. The building exposure data, of course, is much more adaptable to modern automated instrumentation.
4. The Agenda of The Ambient Vinyl Chloride Standards Committee Meeting held July 25, 1974. Because of the work being done gathering data for the Booz, Allen and Hamilton Survey I discussed earlier, the minutes of this meeting have not yet been published. Important decisions arrived at, however, included a decision to complete reporting percentage of readings over 50 ppm as long as this remained the legal limit of exposure; a decision to get personnel monitoring samples in background areas such as lunchrooms, control rooms, and smoke houses; a decision to go to at least twelve sampling points per building and along with this to continue the use of the Bendix units until the new Bendix 6000 chromatograph can be installed and proven satisfactory; and finally, a decision to order 2 new instruments employing the principals of coulometry and gas filter correlation with infra-red spectroscopy. These are described in a subsequent attachment.
5. Trip Report by M. O'Mara and R. Yount surveying new methods of analytic instrumentation for continuous monitoring of vinyl chloride monomer.

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6. Current weekly summary reports on 1) VC1 ambient vapor concentrations, 2) Residual VC1 content of finished PVC products, and 3) Personnel monitoring data.
7. An Agenda of a meeting held with the Ontario, Canada Ministry of Health, the Ministry of Labor, and representatives of the Canadian VCM-PVC producers. I attended this meeting. The reason I include this agenda is that I expect that this may be a pattern that some of you may be following with government agencies in your own Countries. The producers organized the program shown, divided up the subject details among themselves and made a presentation to a group of 15 or 20 members of the 2 government agencies. The program was well received. I think that this type of activity may set an example of what you and the other PVC producers may wish to follow.
8. A notification in the Federal Register Tuesday, July 23, 1974 that the U.S. Coast Guard, Office of Merchant Marine Safety, is proposing amendments to the carriage requirements for vinyl chloride monomer. I suspect that this situation should be watched as it may eventually relate to the handling of vinyl chloride shipments overseas to all countries in the world.
9. Press releases from the Louisville Courier Journal, July 3, 9, 10, 11, and 27. The latter is a very poor duplication, but appears to indicate that workers from at least a few PVC processing plants may be susceptible to angiosarcoma. I am not certain that these cases are very well documented at this point in time.

There is a large amount of technical information being developed under the Code Zero Program. I have asked Jim Hyslop to attempt to screen these data and to report to you those items which may be significant to your operations.

Please let me know if we can be of any further assistance on matters concerning this subject.

Very truly yours,

C.R.Flynn
CRF:imd

cc: R.P.Kenney/A.L.Hatfield/L.M.Puckett/K.H.Lee/C.R.Flynn

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