

Inter-organization Correspondence

BFGoodrich

TO	FIELD POINT OR DEPARTMENT & BLDG. NO.	DATE YOUR LETTER
CPSC Members		
FROM	FIELD POINT OR DEPARTMENT & BLDG. NO.	DATE THIS LETTER
M. E. Schmiederer	D/5428	12/20/76
SUBJECT		

Consumer Product Safety Committee

Friday, December 17, 1976

Present: R. B. Downey
J. R. Goots
D. L. Kent
F. E. Krause
J. F. Malone
R. D. Savage

Absent: J. P. Morrill

1. Toxicity:

- (a) R. Downey reported that Dr. Peter Infante, according to Dr. M. Johnson, appears ripe to publicize results of recent low VCM exposure studies. Both the Maltoni rat study and the ORC human study show mammary cancer at low VCM levels. In response to negative, tentative publicity, SPI has decided to step up plans for media briefings in New York and Washington, DC. Eight panelists, including Dr. M. Johnson and R. D. Savage, will receive intensive training and updating on December 29th in preparation for the meetings during the first three weeks in January. A sophisticated, complete epidemiological study may very well be brought up for PVC/VCM Producers Group consideration.
- (b) R. Savage summarized the SPI action on the EDF suit against the EPA Vinyl Chloride Standard. SPI has filed an intervention, a procedure that will allow monitoring of EDF suit actions. A request for a stay of the effective date of the standard has not been filed by SPI but is still possible. In filing for a stay, SPI would be admitting that the EDF suit had a good chance for success. We are expecting a status report from Jerry Heckman within the week.
- (c) M. Schmiederer reported that the BFGCC TOSCA Task Force had prioritized and classified our chemicals in order of increasing potential concern. A numerical scale is being developed to rate our materials by factors such as poundage, relative toxicity, exposure hazard, PR implications, and fundamental importance to BFG.

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- (d) R. Downey reported that MCA had scheduled a series of informative meetings on TOSCA. R. Strassburg and W. C. Holbrook will be sent descriptive notices of the meetings. MCA is also revising its materials safety sheets on styrene and toluene.
- (e) R. Savage asked whether we ought to participate in the upcoming SPE-NATEC meeting. Participation was urged for the following topics -- new low smoke compounds, monitoring of hazardous materials in production, product liability (SPI-Harding), energy (SPI-Solid Waste Committee or McKennon of Dow).
- (f) The CPSC also recommended that BFGCC supply a speaker for the May meeting of the British Institute of Chemical Engineers. Per Lee Puckett's suggestion, we will recommend W. C. Holbrook to M. D. McClusky.
- (g) M. Schmiederer recommended continued restraint from using a phrase such as "FDA approved." J. Malone is planning to meet with J. Heckman on the producers position on FDA food contact regulation of PVC. J. Malone feels that a petition approach, that considers the end-use of the material, is best.
- (h) Maytag complaints of irritating fumes during processing have been investigated by John McCool, Bill Smith, and Al Ambrose. The primary worker affected appears to have an unusual sensitivity to various chemicals. Neighboring workers are also affected during conditions of high heat and humidity. Our Industrial Hygiene Department will maintain a file on this complaint. M. Schmiederer indicated that TOSCA requires good records and investigation of customer complaints.

2. Environmental:

- (a) M. Schmiederer reported that the application to use the temporary boiler at Louisville will be reviewed at the December 21st Variance Board meeting. The Jefferson County Air Pollution Control Board has suggested using a tall stack for emissions, in order to satisfy their requirements.
- (b) Chromate contamination of Henry water wells has been discovered. The leak has been confined to one drinking water well on plant property. Employees are being informed.

3. Combustibility:

- (a) D. Kent reported that J. Davidson (ALTC) had written scripts for additional combustibility films. M. D. McClusky has encouraged

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the effort. The question of how the funds will be allocated remains.

- (b) D. Kent indicated that the National Electrical Code panel members had not been swayed by the anti-PVC report of Factory Mutual. The UL report effectively counterbalanced this negative report.
- (c) The NFPA/SPI training program is in final stages. Eleven fire fighter departments will preview the program before it goes commercial. D. Kent would like to show it at BFG.
- (d) D. Kent reported that the ASTM-E39 Subcommittee meeting, chaired by Robert Taylor, was attended by J. Tanzilli, John Blair, and Bob Meyer. Taylor noted the availability of the Factory Mutual report, but did not press the issue.



M. E. Schmiederer

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M. E. Schmiederer	D/5428	12/6/76
SUBJECT		

Consumer Product Safety Committee

Friday, December 3, 1976

Present: R. B. Downey
D. L. Kent
F. E. Krause
J. F. Malone
R. D. Savage
M. Schmiederer

Absent: J. P. Morrill
J. R. Goots

1. Toxicity:

- (a) R. Savage reported that Maltoni did not publish his results as we had expected. His European producer sponsors have asked for a re-examination of his data and conclusions. Three statisticians will independently study his conclusions, as will a medical review group. The project is expected to take three months.
- (b) R. Savage indicated that the Environmental Defense Fund (EDF) had petitioned the courts for a review of the EPA Vinyl Chloride Emission Standard. They contend that the standard is not strict enough because Maltoni's data was not considered by EPA and the use of best available technology (ozone technology) was not included. SPI will file an intervening cross petition, make a PR statement, and apply for a stay order to extend the effective date of the standard. Individual companies can also file intervening petitions.
- (c) M. Schmiederer notified the group that the European Community Commission was proposing tighter rules on VCM including maximum worker exposure, measuring and monitoring techniques and guidelines for medical surveillance. Exact limits are not known, although expected to be identical to the current West German standard.
- (d) The "Getting Along Without PVC" conference has been postponed to January 10. G. Cohan received unexpected confirmation notice that he was to speak. The CPSC felt that we ought to find out about which speakers were scheduled and if the program was truly less negative. If it were still negative, we would threaten to withdraw Cohan. We will notify SPI of our reluctance to participate.

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- (e) R. Savage reported that the California Manufacturers Association had met with Senator Gregorio, sponsor of California Bill S.1678. We are still trying to have PVC customers excluded from regulation. BFG may do its own petitioning.
- (f) Stewart Gardner is the new FDA acting commissioner. R. Savage indicated that Jerry Heckman felt that Gardner would benefit from a meeting (before 12/31) with PVC producers to inform him of progress that had been made in reducing residual vinyl chloride monomer. It was decided that J. Malone would represent BFG and recommend a batch by batch approval for PVC food contact applications. John Lawrence will be notified that J. Malone will participate.
- (g) M. Schmiederer reported that we had been denied permission to operate a temporary boiler at Louisville. We are appealing the ruling before the Jefferson County Air Pollution Control Board on December 8. It was decided that someone from PR should attend, if requested. (K. Kaminski later decided that the situation did not require a PR representative on-site).
- (h) R. Downey reported that Tabershaw was beginning a program of plant visits for IISRP worker health studies. He may ask rubber companies for assistance in gaining employees co-operation.
- (i) M. Schmiederer summarized the primary task of the Toxic Substances Task Force. They will be assessing our methods of accumulating, handling, and storing toxic hazard information/complaints.
- (j) R. Savage reported that results of European VCM ingestion studies have been summarized and reported to the Dutch and German governments.

2. Combustibility:

- (a) The SPI PVC/VCM Producers Group, according to R. Savage, has agreed to continue functioning on an ad hoc basis until May 31, 1977. They will also assume responsibility for responding to the PVC safety issue.
- (b) D. Kent reported that the Factory Mutual Report, which is anti-PVC, has been mailed to the National Electrical Code panel members. NEMA has counteracted by sending the favorable UL minutes to the same panel members. It is doubtful that the NEC has had time to evaluate the lengthy Factory Mutual report. We may still be in a status quo position for the May meeting.
- (c) D. Kent reported good response to his requests for evaluation of the SPI Combustibility Policy Statement. Comments cover basic philosophy, rather than specific words. He will evaluate the general drift of comments for J. Malone's PAC meeting.

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- (d) D. Kent reported that Bob Taylor's anti-PVC campaign continues. Taylor is expected to distribute the Factory Mutual report at the ASTM-E-39 committee meeting that he chairs. There will be no positive PVC spokesperson at this Building Maintenance Committee meeting. Therefore, it was decided to send either Jim Tanzilli or Bob Wilging to the New Orleans meeting.
- (e) Dyer has again published the anti-PVC article that he and Dr. V. Esch originally released. The new version, filled with the old misrepresentations of PVC combustibility behavior, now appears in Firehouse. R. Downey will notify SPI (Nuspliger) that we want a rebuttal to the article.

Next meeting will be held Friday, December 17 at 1:00 p.m. in J. F. Malone's office.

M. E. Schmiederer

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