



DOW CHEMICAL U.S.A.

March 3, 1989

TEXAS OPERATIONS
FREEPORT, TEXAS 77541

X. H. H. H. H.

R&S 029657

Stan Cole, Plaquemine
Carey Brannan, Plaquemine
Dave Kiesel, Midland

VINYL INSTITUTE SAFETY WORKSHOP

Our committee in the Vinyl Institute has organized a safety workshop. We hope to have one at least once per year if it is successful. We hope you can support the effort by sending some of your folks. We plan to move the location each year to make it more convenient for your participation. Besides exchanging ideas on safety, it would be a good opportunity to meet with employees of your competitors and customers.

Regards,

Bob/wcb

Bob Oubre
CEP/TOX Technology Center
OC-1120

wcb

attachment



Occidental Chemical Corporation

Feb 12, 1988

MEMO: TO U.I. EHS Committee Members

Old friend Fred Dimmick now heads up the EPA BACT/LAER Clearing House at Research Triangle Park.

The VC and PVC industries are two of many others in the data banks for these particular control technologies.

His address at RTP is:

Emissions Standards Div.
MD 13

Durham NC 27711

Telephone: 919-541-5432

Regards:

Gal King

cc J. Karltich
L. Takacs
F. Kanzler } oxy

R&S 029658

OxyChem

PVC Resins and Compounds/PVC Fabricated Products Divisions

Armand Hammer Boulevard, Box 699, Pottstown, Pennsylvania 19464 215/327-6400

EPA'S SECOND THOUGHTS ON CANCER RISKS

■ TONING DOWN THE ALARM

First it was DDT. Then dioxin. For more than a decade, a steady drumbeat of studies proclaimed how exposure to all sorts of common chemicals was hazardous to your health. Now, better understanding of how chemicals cause cancer in humans is prompting the Environmental Protection Agency to rethink health risks. The process is just getting started, but in the handful of cases reviewed to date, the EPA is finding chemicals less dangerous than previously thought. So far, only lead has been rated more hazardous. The review is certain to have far-reaching impact on EPA monitoring of some 65,000 chemicals. In some cases, it will mean relaxing rules on disposal of toxic wastes and amounts of contaminants permissible in air and water.

A decade ago, researchers determined a chemical's cancer-causing potential by feeding high doses to animals and looking for tumors. Effects on humans were extrapolated, based on weight differences. Now, data are gathered from many more types of studies, and better statistical models are used to translate findings.

Some early results: Estimates of cancer risk from arsenic are a tenth as high as before. Arsenic, a common component of pesticides and mining waste, sometimes seeps into ground water. Methylene chloride, a widely used solvent, long has been known to cause cancer in animals. But recent studies show that in humans it tends to break down into innocuous substances. The EPA calls the cancer risk one fifth what it calculated previously.

Some scientists say that the reviews are an administration move to ease regulations on industry. They note that no health data are available for 78 percent of industrial chemicals. It will take years and millions of dollars to make headway.

■ A CAMPAIGN-SPENDING SPREE

With last week's big infusion of campaign cash from Uncle Sam, presidential hopefuls of both parties are spending as if there's no tomorrow in Iowa and New Hampshire, where opening rounds of the 1988 campaign are just weeks away. Federal matching funds added \$29 million to coffers of the 13 candidates in early January, boosting total cash raised so far to more than \$100 million. Before the White House race is over, some \$400 million will be spent.

Biggest fund-raisers so far: George Bush, on the GOP side, with \$18.7 million, followed by Bob Dole, \$14.2 million, and Pat Robertson, \$14 million. Michael Dukakis leads Democrats with \$10.6 million, followed by Dick Gephardt, \$4.4 million, and Paul Simon, \$4.1 million.

For nearly all contenders, a poor finish in Iowa will be lethal, so they're pulling out all stops, doubling staff size and airing expensive TV ads. Some will exceed federal spending limits--about \$745,000 in Iowa. But it will take weeks to detect, and civil fines are seen as a small price for victory. Many will use accounting tricks to bend limits: Renting cars out of state, for example, and sending staffers across state lines every fifth day to avoid being counted as full-time workers.

How important is money at this stage? Important, but not decisive. Remember John Connally? He raised \$13 million in the 1980 GOP race and landed one delegate. And Democrat John Glenn was rolling in cash four years ago, before his campaign faded. Now, with federal matching funds, all should have enough to get through Iowa and New Hampshire. And success there will bring a deluge of donations. The biggest advantage of early cash: Being able to field a national staff to slate delegate.

■ MORE MASS MURDERS?

The nation suffered its worst mass-murder toll ever in 1987. Some 50 persons were killed by relatives in eight incidents, three of them near year's end. And the situation could get worse because of the "copycat factor." A Massachusetts man suspected of killing his sister in early January was found with news clippings on recent mass murders. Days later, a man in Washington, D.C., was charged with fatally stabbing his two sons, both cerebral-palsy victims. Family members constitute some 40 percent of mass-murder victims. Typical assailant: A middle-aged white male, a loner, set off by such trauma as job loss or divorce. Experts don't know how to stop the killings. Says one criminologist: "We can't round up everyone who fits the profile, because 99 percent of them will never do it. It's the price we pay for a society that believes in civil liberties."

by Jeffery L. Sheler with Kathleen McAuliffe,
Andy Plattner, Harrison Rainie and Ted Gest

R&S 029659

CLEAN AIR ACT
STATIONARY SOURCE
CIVIL PENALTY POLICY

March 25, 1987

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R&S 029661

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R&S 029662

1. Brief Description

Dr. Maurice N. Johnson, BFGoodrich Director of Environmental Health and Dr. John Creech, BFGoodrich Louisville Plant Physician were the first in the world to link exposure to vinyl chloride with human cancer.

Late in 1973, Dr. M. N. Johnson attended a meeting where an interim report on Dr. Cesare Maltoni's vinyl chloride health effects study was presented. Dr. Maltoni had observed angiosarcoma of the liver in his rat studies. Dr. Johnson connected these findings with observations Dr. Creech had reported concerning BFGoodrich plant employees. Within three weeks, Dr. Johnson and Dr. Creech met and discussed the combined human and animal data and decided to immediately pursue the possibility that the human cases could have been work related to vinyl chloride in the workplace.

In January, 1974, BFGoodrich informed OSHA, NIOSH and the Kentucky Department of Health of the link of vinyl chloride and angiosarcoma of the liver.

2. Value of Contribution

The early discovery and announcement of the link of vinyl chloride and angiosarcoma of the liver allowed the VCM/PVC industry to take early control measures and curb the number of related angiosarcoma cases. As of January, 1988, 138 deaths have been reported worldwide as a result of vinyl chloride caused angiosarcoma of the liver.

Without the early discovery and announcement of the link by Dr. Johnson and Dr. Creech, the high vinyl chloride exposure activities (primarily reactor cleaners) would have continued indefinitely. This discovery and announcement forced the development and use of new technology resulting in greatly reduced worker and community exposures to vinyl chloride. Much pain, suffering and death have thus been avoided.

R&S 029663

agenda

FVI SI

HEALTH, SAFETY & ENVIRONMENT COMMITTEE

The Atlanta Hilton and Towers
Courtland and Harris Streets, N.E.
Atlanta, Georgia 30043
John Adams Room

Tuesday
March 8, 1988
11:00 a.m.-4:00 p.m.

1. Self-introductions. Group
2. Safety B. Barton/Group
 - a. Subcommittee Update.
 - b. Dow Approach to Safety.
 - c. Key Elements of an Effective Safety Program.
(This is to be a company-by-company discussion.
Each committee member should be prepared to discuss - What Do You Do? - How Does It Work? Please bring statistics.)
 - d. Future Vinyl Institute Safety Activities.
3. VI Safety and Environmental Awards:
 - a. Calendar Year 1987 Recipients. M. Scheck
 - b. Other Uses of Data.
 - c. Recommendations to VI Board on Annual Safety Award.
4. EPA Update: P. de la Cruz
 - a. NRDC v. EPA
 - b. SPI v. EPA
5. TCLP Task Force J. Ledvina
6. SARA Section 110 VCM Toxicological Profile A. Gellner
7. Title III, July 1988 Emission Reporting Group
 - a. Basis for Fugitive Emissions
8. VI OSHA Labeling Survey M. Scheck
9. Old/New Business.
10. Next Meeting.

(Note: As currently planned, the Health, Safety & Environment Committee is scheduled to meet on May 11, 1988 in conjunction with the Vinyl Institute Annual Meeting.)

Paul J. Usinowicz, Ph.D., P.E.
Manager
Environmental Technology

AIR
PRODUCTS 

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BCP Management, Inc., General Partner

J. C. (CRIS) LUNN, JR.
TECHNICAL MANAGER

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R&S 029665

TABLE I
VINYL CHLORIDE LABELING PRACTICES
VI MEMBER COMPANIES MANUFACTURING VCM

COMPANY	DOES TANK CAR CARRY DOT LABEL?	OSHA STD. 1910 12000 SEC. P1 LABEL	DOES TANK CAR CARRY "CANCER SUSPECT AGENT" LABEL?	IS MSDS SENT WITH TANK CAR?	COMMENTS
PPG INDUSTRIES *	YES	? *	YES	NO yes *	MSDS sent by mail with initial shipment to customer in calendar year, on a yearly basis. Updates to comply with OSHA 90-day requirement.
DOW CHEMICAL	YES	YES	YES (On materials shipped from plants.)	YES	OSHA label and MSDS inside dome.
BORDEN CHEMICAL	YES	?	YES	YES	Tank cars as received carry OSHA "Cancer Suspect Agent" Label.
BFGOODRICH	YES	YES	YES (Welded inside tank car.)	NO	MSDS with shipping papers.
VISTA CHEMICAL	YES	YES	YES	NO	
GEORGIA GULF	YES	YES	YES	YES	Prior to or at time of first shipment.

Revised 9/30/87

* Update from C. Graybill:
Name and address not
on car, available through
CHEMTREC

R&S 029667

TABLE II
PVC LABELING AND MSDS PRACTICES (RESIN)
VI MEMBER COMPANIES MANUFACTURING PVC RESIN

COMPANY	LABEL ON RESIN CONTAINER			MATERIAL SAFETY DATA SHEETS			COMMENTS
	DOES LABEL CARRY OSHA "CANCER SUS- PECT AGENT" LABEL?	DOES LABEL CAR- RY NOTATION RE: DUST?	DOES LABEL CAR- RY NOTATION RE: COMBUS. HAZARD?	DOES MSDS IN- CLUDE VC "CANCER SUSPECT AGENT" STATEMENT?	NOTATION RE: DUST AS A "NUISANCE"?	NOTATION RE: FIRE/COMBUS- TION HAZARD?	
AIR PRODUCTS	YES (On bags bulk cars, & silos)	NO	NO	YES	YES	YES	
CERTAINTEEZ	YES	NO	NO	YES	YES	YES	
GEORGIA GULF	YES	NO 1)	NO 1)	YES	YES	YES	*Label sent w/ bill of lading
OCCIDENTAL	YES if > 1ppm RVCM NO if < 1ppm RVCM	NO	NO	YES	YES	YES	
BORDEN	All suspension resin SO LABELED. All paste resin <1ppm RVCM is not labeled.	NO	NO	YES	YES	YES	
BFGOODRICH	If > 8.5ppm RVCM Would be so labeled. Mostly, resins are < 8.5ppm and are not labeled.	YES	YES	YES	YES	YES	
VISTA	YES	YES	YES	YES	YES	YES	

1) To be changed.

Revised 9/30/87

R&S 029668

TABLE III
PVC COMPOUND LABELING AND MSDS PRACTICES
VI MEMBER COMPANIES PRODUCING PVC COMPOUNDS

COMPANY	LABEL ON COMPOUND			MATERIAL SAFETY DATA SHEET			COMMENTS
	DOES LABEL CARRY OSHA "CANCER SUS- PECT AGENT" LABEL?	DOES LABEL CAR- RY NOTATION RE: DUST?	DOES LABEL CAR- RY NOTATION RE: COMBUS. HAZARD?	DOES MSDS IN- CLUDE VC "CANCER SUSPECT AGENT" STATEMENT?	NOTATION RE: DUST AS A "NUISANCE"?	NOTATION RE: FIRE/COMBUS- TION HAZARD?	
GEORGIA GULF	NO	NO	YES	YES	NO	YES	Label also carries informa- tion on sensitivity to stabilizers
OCCIDENTAL	NO	NO	NO	NO	NO	YES	MSDS forms list limited haz- ard warnings for ingredients (stabilizers, plasticz. etc.)
BFGOODRICH	YES If RVCM > 8.5ppm	YES	YES	YES	YES	YES	Labels address fumes from processing.
VISTA	YES	YES	YES	YES	YES	YES	

Revised 9/30/87.

IS IT YOUR COMPANY'S STANDARD PRACTICE TO APPLY OSHA WARNING LABELS ON THE FOLLOWING:

(29 CFR 1910.1017) Page 1 of 2

COMPANY	PLANT STORAGE CONTAINERS /HOPPERS	PACKAGES /BAGS OF PVC RESIN	PACKAGES /BAGS OF PVC COMPOUND	CONTAINERS /GAYLORDS OF PVC RESIN	CONTAINERS /GAYLORDS OF PVC COMPOUND	DRY BLEND SHIPMENTS	RAILROAD HOPPER CARS	OTHER SHIPMENT CONTAINER OR IN-PLANT
Air Products & Chemicals	Yes	Yes	N/A	N/A	N/A	N/A	Yes, in plastic envelope in dome with MSDS when loaded.	Trucks - Label handed to driver w/ B/L and MSDS.
Vista Chemical Company	No	Yes	Yes	Yes	Yes	Yes	Yes, differs by plant. One has affixed stick-on 5"x7" sign to bottom cone of hopper/both sides. (8 signs per car. Other one has 4"x6" label in envelope to each valve on compartment bottom/8 per car. Label used contains additional info.	No answer
CertainTeed Corporation	No	N/A	N/A	Yes	N/A	No	Yes, each hatch cover (8) and unloading port (8) are labeled with sticker. If labels not present, warning label applied in center of hatch cover and/or unloading port.	No answer.
BFGoodrich Company	No	Yes, only if RVCM > 8 ppm.	No (but is labeled under HCS effective 1st quarter '88.	Yes, only if RVCM > 8 ppm.	No, but is labeled under HCS effective 1st quarter '88.	-	Yes, only if RVCM > 8 ppm.	Waste Containers
Georgia Gulf: Plaquemine	Labeled under HCS	-	-	-	-	-	Yes, cars stencilled in 1" letters. "Product Label" sent w/ B/L of resin shipments.	All in-plant containers labeled in accordance with HCS.

HCS = Hazard Communication Standard

IS IT YOUR COMPANY'S STANDARD PRACTICE TO APPLY OSHA WARNING LABELS ON THE FOLLOWING:

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Page 2 of 2

[illegible]

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Revised 9/30/87

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AIR PRODUCTS	YES (On bags bulk cars, & silos)	NO	NO	YES	YES	YES	
CERTAINTZED	YES	NO	NO	YES	YES	YES	
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