

2/6/74

Dear Sir:

Last week we sent to you a public statement by The B.F. Goodrich Company concerning our investigation of the deaths of three employees at our Louisville, Ky. plant from a rare form of liver cancer, and the possible connections between these deaths and their work over a number of years in our PVC polymerization operations.

Later search of available medical records revealed that a fourth employee had died from the same cause, angiosarcoma of the liver, in 1968. Our public statement on this case is enclosed.

At the time of issuing our first statement on January 23, B.F. Goodrich provided all data we had at that time to the Kentucky Department of Labor, representative of the Federal Occupational Safety and Health Administration (OSHA) and to the National Institute of Occupational Safety and Health (NIOSH). These agencies are currently investigating these cases, are carrying out industry-wide epidemiological studies, and are in contact with European governments with major PVC industries. We are continuing to cooperate fully with these agencies.

OSHA has called a hearing to investigate this subject further. For your information, we are enclosing a copy of the Federal Register, page , Jan. 30, announcing this hearing. One of the stated purposes of this hearing is to determine whether OSHA should issue revised work standards.

Also cooperating with the government are 19 producers of vinyl chloride monomer and PVC under sponsorship of the Manufacturing Chemists Association,

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1825 Connecticut Ave., N.W., Washington, D.C. 20009. This group is sponsoring lengthy and in-depth toxicological and epidemiological studies on vinyl chloride and workers.

As yet no definite connection has been established between these four angiosarcoma cases and any of the some 50 chemicals which may have been used in polymerization of PVC or its compounds at our Louisville plant. Vinyl chloride monomer, a chlorinated hydrocarbon, is a primary suspect due to the fact it is a major raw material of high volatility to which our employees have probably had the greatest exposure. It should be pointed out that searches of medical records at our other five plants have revealed no similar cases, and no others in the United States have been reported.

As you may know, some residual unpolymerized vinyl chloride monomer remains in commercial polyvinyl chloride polymers and compounds. The levels in Geon resins, plastics and latexes range from virtually undetectable levels to those high enough to suggest the possibility of detectable vapor concentrations in closed storage or in some processing steps, such as heated mixing equipment.

B.F. Goodrich is not in a position to recommend specific precautions for your manufacturing operations. However, we believe you will want to review your own procedures and take appropriate action.

We would like to point out that the present investigations are confined to polymerization operations, where the amount of vinyl chloride, the starting monomer, is much higher than it would be in any process we know involving finished polymer or compounds. In our plants we have reduced exposure to levels below 50ppm of vinyl chloride.

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It is not the intent of this memorandum to state ^{that} the cause of angiosarcoma of the liver is exposure to vinyl chloride monomer but to point out to our customers that small, variable amounts of this raw material remain in the polymer in unchanged form and that it is one of the suspected chemicals.

We will do our best to keep you informed on this subject as investigations proceed.

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