Air Products and Chemicals INC.

copy E. Reed
E. Pomeia
4-3 74

Date 22 March 1974

INTEROFFICE
MEMORANDUM

Subject Action Program on
PVC/MCA Work List

To T. L. Carey — Valley Forge (Location, Organization, or Department)

From J. T. Barr — Valley Forge (Location, Organization, or Department)

cc: A. R. Adams
R. Fleming
J. T. Sebastianelli
W. M. Smith
E. M. Spurlock

Mr. Fleming discussed this morning with E. M. Spurlock and myself the action APCI should be taking as an individual company on the 10 proposed action points presented to the MCA group last Tuesday in Washington. The notes from this discussion are being reduced to writing here because the travel plans of the individuals makes discussion difficult.

Using the numbering system of the attached suggestion program, the following assignments were made:

1. Ross Adams will pursue the economic impact statement through SPI and his staff.

2. M. Spurlock will arrange a meeting with the proper person at OCAW for an informal discussion on what we have done, and seek possible mutual goals. Barr will also attend. The plants will assure that the employees are kept fully aware of the course of action being taken by the company and why and how each step relates to protecting employee health.

3. Barr is to prepare a suggested draft of an informational letter to all Congressional representatives for Pennsylvania, Kentucky, and Florida, to give them a working knowledge of the situation and prepare them for possible future calls on them for assistance. When an acceptable draft is available this is to be sent out over Mr. Fleming's signature, if he has not returned.

4. Ross Adams is to prepare an informational letter for our customers, emphasizing the implications of the proposed action and preparing them to act. This should be sent to all resin and compound customers unless there is a cogent reason for not including some. The legal department should be consulted on the content of the letter.

(320)

AP00035254

5. You have established a good relationship with Mr. Cox of OSHA, and this should be cultivated. I called Mr. Cox to ask him when the official announcement of Stender's action would be announced, and he said that present plans called for the release to be made today (Friday). He is not sure when it will appear in the Federal Register, but it will be soon. The meeting between Stender and senior industry representatives is being held at noon today. Companies to be represented are Goodrich, Goodyear, Firestone, Dow, Diamond Shamrock, and Olin. Names of persons attending were not available except for Vittone. The meeting was called hurriedly, and only nearby companies were notified. He invited us to meet with him at our convenience, and Mr. Fleming suggests that we do so in the near future.

6. Ross Adams is to follow up on reviewing the comments received by MCA on the draft industry statement and see that this is completed and forwarded to OSHA.

7. Barr is to contact Dr. Key of NIOSH to determine their program in this area and report. Dr. Smith will continue to follow the Tabershaw-Cooper results and their interpretation.

8. Ross Adams has made preliminary contact here and will pursue.

9. Barr will brief J. Sebastianelli on what is needed here, who will arrange for someone to follow this program.

10. You and I have a broad outline of a presentation to be made at the forthcoming formal hearing, and the proper persons have been contacted to gather the detailed data needed for this. The announcement of the new standard in the Federal Register will serve as a further guide.

In addition to these points the following points were discussed.

a. Stauffer is making a telephone survey of the industry, its actions to date and reactions to the various proposals. These results have been promised to us.

b. At least four meetings are scheduled in the near future. Barr will attend the April 2 MCA/EPA meeting at Washington and the Vinyl Chloride Safety Assn., probably to be held the week of April 15. Dr. Smith will cover the N. Y. Academy of Science meeting May 10, and the Tabershaw-Cooper report expected to be received shortly after April 15.

c. We and Calvert should cultivate the apparently congenial atmosphere in the office of Dr. Block at KOSHA.

AP00035255

d. Dr. Kotin will take a full-time position at Johns-Manville on 1 June. He will suggest a suitable replacement.

J. T. Barr

JTB:mb

AP00035256

SUGGESTED MCA ACTION PROGRAMS

1. Prepare an economic impact statement of effects on industry from a regulation using the NIOSH Health Standard.

2. Understand Labor's position on the proposed Standard and develop unified positions where appropriate.

3. Direct an immediate and effective informational program to Congressional representatives.

4. Obtain immediate and effective PVC converter support.

5. Develop a beneficial liaison with the Department of Labor and provide a stragegy to obtain a realistic OSHA Standard.

6. Advise OSHA of MCA's position with respect to the recommended Health Standard.

7. Establish a comprehensive understanding of epidemiological data for workers exposed to vinyl chloride monomer.

    a) What is a realistic comparison with population at large?

    b) Summarize and provide background information on which there is a basis for establishing a safe exposure level for vinyl chloride.

8. Involve the Society of the Plastics Industry in the problam.

9. Research and understand the legal process for establishing Health Standards for carcinogenic materials.

    a) Develop a comparison of the vinyl chloride situation and proposals with the handling of other potential carcinogens.

        1 - List of 14 carcinogens

        2 - Asbestos

        3 - Beryllium

        4 - Others X-rays, Fibers.

10. Formalize and recommend a suitable occupational health standard to OSHA.

AP00035257