



THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

250 PARK AVENUE • NEW YORK, NEW YORK 10017 • 212 687-2675

mailed 7/31/74

MINUTES

VCM AND PVC PRODUCERS GROUP

Statler Hilton
Washington, D. C.

June 5, 1974
8:30 a.m.

Attendees:

Anton Vittoni, Chairman, B. F. Goodrich Chemical Co., 6100 Oak Tree Blvd., Cleveland, Ohio 44131
Ray J. Abramowitz, Hooker Chemical Corp., River Road, Burlington, N. J. 08016
Dr. A. Ross Adams, Air Products & Chemicals, 5 Executive Mall Bldg., 656 Swedesford Road, Wayne, Pa. 19087
R. Craig Andrews, Diamond Shamrock Chemical Co., 1100 Superior Avenue, Cleveland, Ohio 44107
F. T. Barr, Air Products & Chemicals, 656 Swedesford Road, Wayne, Pa. 19087
Henry Bialecki, Olin Corporation, 120 Long Ridge Road, Stamford, Ct. 06904
Jerry Blizin, Hill & Knowlton, 1425 K Street, N.W., Washington, D. C.
D. Bloomfield, Hooker Chemical Corp., River Road, Burlington, N. J. 08016
B. Gawain Bonner, Tenneco Inc., P. O. Box 2511, Houston, Texas 77001
R. S. Brookman, Firestone Plastics Co., P. O. Box 699, Pottstown, Pa. 19606
Fielding Cochran, Robintech Inc., 1407 Texas Street, Ft. Worth, Texas.
H. E. Connors, Diamond Shamrock Chemical Co., 1100 Superior Ave., Cleveland, Ohio
Walter B. Connolly, Jr., Firestone Plastics Co., 1200 Firestone Pky., Akron, Ohio
Dr. William L. Cox, The Goodyear Tire & Rubber Co., 144 Goodyear Blvd., Akron, Ohio 44316
John M. DeVos, Allied Chemical Corp., P. O. Box 1057R, Morristown, N. J. 07960
D. S. Dixler, Keller & Heckman, 1150 17th St., N.W., Washington, D. C. 20036
D. J. Dowrick, ICI America Inc., 444 Madison Ave., New York, N. Y.
Ray Durazo, PPI, 250 Park Avenue, New York, New York 10017
E. Whitehead Elmore, Ethyl Corporation, Ethyl Tower, 451 Florida, Baton Rouge, La. 70801
John E. Ertel, Robintech Inc., P. O. Box 2342, Ft. Worth, Texas 76101
H. E. Everson, Diamond Shamrock Chemical Co., 1100 Superior Ave., Cleveland, Ohio
Joe Fath, Tenneco Inc., P. O. Box 2, Piscataway, N. J. 08833
Vince P. Ficcaglia, Arthur D. Little Inc., Acorn Park, Cambridge, Mass. 02140
Geo. S. Flint, Tenneco Chemicals, Park 80 Plaza W-1, Saddle Brook, N. J.
John C. Floros, Great American Chemical Corp., 650 Water Street, Fitchburg, Mass.
D. H. Francis, Goodyear Tire & Rubber Co., 1144 Market Street, Akron, Ohio
A. W. Fuhrman, Great American Chemical Corp., 650 Water Street, Fitchburg, Mass.
Robert Gerwig, Conoco, 34 Lake Drive, Park Eighty Plaza East, Saddle Brook, N.J.
Jos. E. Hadley, Keller & Heckman, 1150 17th St., N.W., Washington, D. C. 20036
A. J. Haefner, Ethyl Corp., P. O. Box 341, Baton Rouge, La. 70821
George B. Hegeman, Arthur D. Little Inc., 35 Acorn Park, Cambridge, Mass. 02140
G. J. Henrich, Olin Corp., Long Ridge Road, Stamford, Ct. 06904
Mary-Elizabeth Jacques, The Pantasote Co., 51 Weaver Street, Greenwich, Ct. 06830
Jack Jaglom, Pantasote Co., 26 Jefferson Street, Passaic, N. J. 07055

SPI- 12326

Charles H. Jenest, Arthur D. Little Inc., Acorn Park, Cambridge, Mass.
W. V. Kane, Esq., Diamond Shamrock Chemical Co., (Reavis, Pogue, Neal & Rose),
1100 Connecticut Ave., Washington, D. C.
Flynt Kennedy, Continental Oil Co., P. O. Box 1267, Ponca City, Oklahoma 74601
M. J. Kleinfeld, Uniroyal Chemical, Emic Building, Naugatuck, Ct. 06770
Milton Kline, Borden Inc., 511 Lancaster Street, Leominster, Mass. 01453
L. R. Kuhn, Stauffer Chemical Co., Westport, Ct. 06880
Cleveland Lane, B. F. Goodrich Chemical Co., 500 So. Main St., Akron, Ohio 44131
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R. W. Laundrie, General Tire & Rubber Co., One General St., Akron, Ohio 44329
D. H. Markusson, General Tire & Rubber Co., One General St., Akron, Ohio 44329
E. J. Masek, Diamond Shamrock Chemical Co., 1100 Superior Avenue, Cleveland, Ohio
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Roy W. McCune, The Pantasote Co., of N.Y. Inc., 26 Jefferson St., Passaic, N.J.
Mark Minkus, Tenneco Inc., Park 80 Plaza West-1, Saddle Brook, N. J.
J. R. Mudd, General Tire & Rubber Co., P. O. Box 68, Ashtabula, Ohio 44004
C. M. Neher, Ethyl Corp., 861 Delgado, Baton Rouge, La. 70808
John L. Nelson, B. F. Goodrich Chemical Co., 6100 Oak Tree Blvd., Cleveland, Ohio
Nick Nuechterlein, Dow Chemical Co., 4604 Briston Ct., Midland, Michigan
H. A. Peed, Borden Chemical Co., 511 Lancaster St., Leominster, Mass. 01453
R. J. Reynolds, Shell Chemical Co., One Shell Plaza, Houston, Texas
Tom Riley, Goodyear Tire & Rubber Co., 812 National Press Bldg., Washington, D.C.
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Washington, D. C. 20006
John Spano, Monsanto Co., 800 N. Lindbergh Blvd., St. Louis, Missouri 63166
Roy Stack, PPG Industries, 1 Gateway Center, Pittsburgh, Pa. 15222
Arthur B. Steele, Union Carbide Corp., 270 Park Avenue, New York, N. Y. 10017
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Todd Walker, Firestone Plastics Co., Pottstown, Pa. 19464
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Richard A. Weller, Arthur, Dry & Kalish, Attorneys for Uniroyal, Inc., Emic Bldg.,
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William Wetzel, Hooker Chemical Corp., River Road, Burlington, N.J.
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John Whittberry, Union Carbide Corp., 270 Park Ave., New York, N. Y. 10017
G. J. Williams, Dow Chemical Co., Abbott Road Bldg., Midland, Michigan 48640
Paul Wright, Monsanto Co., 800 N. Lindbergh Blvd., St. Louis, Michigan 63166
Thomas J. McGrath, General Manager, SPI, 250 Park Avenue, New York, N.Y. 10017

Committee Chairman Tony Vittone called the meeting to order and asked for self-introductions.

Following the approval of the April 16 minutes he called upon the representatives from A. D. Little to give a preliminary report about their findings regarding the economic impact of a shutdown of the VCM and PVC industry.

The impact of an instantaneous shutdown is as follows:

SUMMARY

ECONOMIC IMPACT OF IMMEDIATE
SHUTDOWN OF PVC RESIN OPERATIONS

1972
(Preliminary)

<u>Industry</u>	<u>Loss in Production and Sales (a) (Billion \$)</u>	<u>Loss in Employment (MN)</u>
Vinyl Chloride Monomer	0.2	*
PVC Resin	0.6	**
Construction-Related	14.0-20.0	0.5-0.8
Apparel-Related	2.5--3.5	0.1
Motor Vehicle-Related	35.0-50.0	0.6-1.0
Specialty Products ¹	8.0-10.0	0.3-0.4
Miscellaneous Products ²	<u>4.7-5.7</u>	<u>0.1-0.3</u>
TOTAL	65.0-90.0	1.6-2.6

COUNSEL REPORT

Mr. Heckman reviewed the situation relative to OSHA and EPA. He advised that he has been in communication with OSHA and they are of the opinion that it is, at this time, impossible to present data which will establish a safe level for VCM exposure.

He expressed the opinion that the 50 ppm has not been shown to be unsafe. We should adopt a position which will bring the exposure level of VCM to the workers down to a level as low as is technologically feasible. He stated that while 50 has not been shown to be unsafe it would be prudent for the industry to strive for the lowest level that technology will allow. In closing, he advised that the legislation which formed OSHA placed the burden on OSHA to demonstrate that their standards are technologically and economically feasible. The intent of the OSHA legislation is to insure that workers have a safe environment to work in, and not to close industry.

EPA Committee

The Committee is reviewing methods which will possibly remove VCM from the atmosphere. The Committee recognizes that there are no known technologically feasible methods to remove VCM from diluted streams and they will try to devise a method.

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OSHA COMMITTEE

Chairman Harry Connors reported that the OSHA Committee has conducted an epidemiological study which indicated that in the past there were high levels of VCM in the polymer plants, but that since 1960 these levels have been considerably reduced.

The Committee has obtained data which indicates that the major portion of a fabricators plant is presently below one part per million of VCM. VCM has been measured at levels higher than one part per million in the processors mixing rooms and in their storage areas, however, it appears that with increased ventilation, the VCM levels should be considerably reduced.

Mr. Connors reported that the OSHA Committee members unanimously stated that it was not feasible for workers to continuously wear the prescribed OSHA respirators.

He stated that at their last meeting several votes were taken regarding the proposed industry position. A majority believed that a maximum of 40 ppm with a TWA of 25 ppm was feasible but did not agree that we could gradually reduce this level.

They also believed that processors do not have a VCM problem, and that processors should be eliminated from the standard.

Jerry Heckman advised that we should be able to file post hearing comments. Usually the record will be kept open for two to three weeks.

Industry Position

Mr. Vittone noted that the British position as published in the European Chemical News Issue of May 24, 1974 was distributed to the attendees. A copy is attached to the minutes.

He reported that the Steering Committee met last night until early in the morning. The major points of the industry position are:

1. We must make it clear to OSHA that there is considerable differences between monomer and polymer plants and that OSHA is not dealing with a monolithic industry.
2. We must try to convince OSHA that fabricators or processors should not be subject to the standard because there is little if any worker exposure to VCM. Also, by means of improved ventilation, those few areas of the processors plant which show detectable levels can be reduced to no-detectable.
3. Industry health records survey can show that workers years ago were subject to large readings of VCM, but since the 1950's improved conditions have greatly reduced the VCM level.

Monsanto Company has volunteered its facilities in Springfield to participate in an analysis and decision making program relative to the effects of VCM exposure. Those companies who supplied information for the Derhnel questionnaire should make every effort to attend the June 17-18 and 19 meetings.

The analysis and decision method used may show that the rat data is not applicable to humans, and it's possible that it will support Derhnel's conclusions.

4. It is the industry's position that it will do all it can to achieve the lowest feasible levels of VCM with its plants.

The Steering Committee's recommended position for polymer plants is that by October 5, 1974, a 25 ppm ceiling using a sequential monitoring system which will sound an alarm when the level exceeds 25 ppm be established. When the alarm sounds, workers will be required to wear a canister type mask.

After two years, or by October 5, 1976, the maximum ceiling will be 25 ppm with a TWA of 10 ppm.

The Steering Committee's recommended position for monomer plants is that by October 5, 1974, a 10 ppm ceiling using a sequential monitoring system which will sound an alarm when the level exceeds 10 ppm be established. When the level exceeds 10 ppm, workers will be required to wear a canister mask.

After two years, or by October 5, 1976, the maximum ceiling will be 10 ppm with a TWA of 5 ppm.

It is recognized that not all plants will be able to meet these levels, and it is hoped that OSHA will permit those plants to avail themselves of the variance procedure allowed by law.

Following the Steering Committee's statement there was considerable discussion.

Joe Fath of Tenneco moved that as an industry position, the permanent standard be set at a maximum exposure level for workers without respirator equipment at 25 ppm accompanied by a continuous monitoring device for polymer plants. That after a two year period, or by October 1976, an additional standard of 25 ppm ceiling with a 10 ppm TWA be superimposed with the caveat, unless the industry shows that the standard is not economically and technologically feasible, and provided that medical and scientific research has not shown an acceptable risk threshold above that level by that date.

The motion was seconded and defeated 10 to 8.

A motion was made that Mr. Fath's motion be modified to a level of a 40 ppm ceiling with a TWA of 25 ppm, and with a 1976 level of a 25 ppm ceiling with a TWA of 10 ppm for polymer plants.

The motion was seconded and carried 12 to 6.

A motion was made that we accept the Monsanto offer to meet at their facilities on June 17-18 and 19 to participate in their analysis and decision making project.

The motion was seconded and carried 20 to 0.

A discussion was held about the approved industry position. Mr. Vittone stated that B. F. Goodrich is committed to moving faster to obtain lower levels. In view of this he was of the opinion that he should resign as Chairman, and let someone else state the industry position.

SPI- 12330

The discussion that followed Mr. Vittone's comments revealed that there was no fundamental difference among the members. They agreed that the industry should achieve as low a level of worker exposure to VCM as possible. The concern of the attendees was the time frame in reaching the levels since it's based on the proposition that technology which does not now exist will hopefully be developed.

A motion was made that we modify the industry position regarding the exposure levels as follows:

By October 5, 1974 - A maximum of 40 ppm with a TWA of 25 ppm
By October 5, 1975 - A maximum of 25 ppm
By October 5, 1976 - A maximum of 25 ppm with a TWA of 10 ppm

The motion was seconded and carried 15 to 4.

For VCM plants, a motion was made that the levels be set at 10 ppm ceiling by October 5, 1974 and by October 5, 1976 a ceiling of 5 ppm TWA. The motion was seconded. It was agreed that after this meeting the VCM producers will determine if these levels are acceptable. If not, they will so advise SPI. If SPI does not hear objection, it will be assumed that all VCM producers concur.

Residual VCM Level

A discussion was held about the acceptable VCM residual level. The attendees agreed that we should not strive to obtain the lowest possible VCM residual level in the resin.

A motion was made that we recommend a residual level of 0.05% (500 ppm) by October 5, 1974. The motion was defeated 9 to 8.

A number of attendees expressed the opinion that since OSHA has permitted residuals of 0.1% in other OSHA standards concerned with carcinogens, we should recommend the same level because it will encompass a broad range of resin grades.

A motion was made that we recommend a residual VCM level in PVC resins of 0.1% (1,000 ppm). The motion was seconded and carried 15 to 2.

Witnesses

In view of the lateness, Mr. Vittone stated we will not have time to review the witnesses needed to present the industry position. He requested that the attendees send the names of possible witnesses to Mr. Heckman. Mr. Vittone said that since we were unable to complete our business today we will hold another meeting on June 10, 1974 starting at 9:00 a.m.

There being no further business to transact, the meeting was adjourned at 3:20 p.m.

Respectfully submitted,

Thomas J. McGrath
General Manager

TJMcG/pb
Attachment

SPI- 12331

ECN technical week

CIA argues case against zero VCM exposure limits

AT A press briefing held last week in London on vinyl chloride (VCM) toxicity the UK Chemical Industries Association (CIA)'s vinyl chloride committee stressed that the PVC industry would stop dead if society demanded zero exposures to VCM in the production, fabrication and use of PVC to eliminate the risk of industrial injuries.

The vinyl chloride committee, which was set up about three months ago, has as its terms of reference, "to enquire into the nature and extent of the hazard to health of vinyl chloride, whether in the free state or as a constituent of polymerized material. Secondly, to establish in collaboration with expert bodies both in the UK

penetration of PVC in to a wide range of market applications, as a major industrial material where alternatives are not available in the quantities nor in most cases with the properties required, the CIA stated.

The four UK producers of PVC are so far spending over £4m. this year to reduce the maximum possible atmospheric concentration of VCM exposure to plant operatives to 25 ppm by volume, from the existing legal limit of VCM exposure of 220 ppm.

Currently, 12 cases of angiosarcoma of the liver (a rare liver cancer) have been discovered in the USA, one in the UK, and around five in continental Europe. These diagnoses (two cases are still surviving) have occurred over a ten-year period.

Of the 18 cases, seven have occurred on one plant in the USA (B. F. Goodrich), a further three in another US plant (Goodyear), with the incidence elsewhere being very low. Average exposure time of the known cases approaches 20 years. However, the levels of vinyl chloride monomer to which these workers were exposed, thought to be at least 1 000 ppm., is extremely high compared with present permitted levels.

Average exposure levels in the UK are now 5 ppm for plant

atmospheres in VCM production, 50 ppm in plant atmospheres for production of PVC from VCM, and generally 0.5 ppm in plant atmospheres for fabrication of PVC articles. Vinyl chloride absorbed in a human diet is about 0.001 ppm of the diet.

Thus the CIA considers that the problem, if one still exists, is confined to the industrial process of converting VCM into PVC. Levels in food are infinitesimally small, and atmospheric exposure levels in the fabrication industry, where they may at present exceed 5 ppm, can easily be reduced by improved ventilation, the CIA maintains.

Therefore the committee's work is being focused on the VCM polymerization process itself. It estimates that average atmospheric concentrations in the UK were 1 000 ppm in the 1945-1955 period, 400-500 ppm in 1955-1960, 300-400 ppm in 1960-1970, 150 ppm in mid-1973, and is now 50 ppm.

Major improvements in the past six months have come mainly from the elimination of procedures which permitted vinyl chloride to escape into the plant atmosphere (within the prescribed limit of 200 ppm).

Ultimate Levels

Further improvement will come from detailed plant modifications to eliminate or reduce adventitious leaks, according to the CIA committee, with the ultimate for most existing plants at 10 ppm. However, entirely new plants using the latest available technology might achieve 5 ppm, as the lowest possible level attainable, the CIA states.

In contrast, OSHA, the US Government body concerned with the VCM problem has just proposed a standard of less than 1 ppm for atmospheric VCM levels. The proposal is however open to public comment before being adopted as law and the US Society of the Plastics Industry has already responded by calling the new standard "excessively and unrealistically restrictive."

Up till now a temporary limit of 50 ppm has been established in the USA. Nevertheless a limit of less than 1 ppm is tantamount to a zero exposure, and therefore zero risk.

The CIA stresses that it is impossible to prove a zero risk. In the case of VCM there has always been some risk, as VCM presents a fire and explosion risk very similar to that of butane and other liquefied gases used for heating and lighting. There have been more deaths from fire and explosions of such materials than from industrial disease and in the case of VCM, on a worldwide basis, more people have died from these causes in the past ten years than from cancer, the CIA committee stated.

As far as fabrication of PVC is concerned, the CIA is recommending that fabricators achieve atmospheric concentrations of less than 5 ppm. However, the fact remains that the concentration of VCM in freshly-produced PVC ex-plant is in the range of 200-400 ppm by weight, although the level drops on storage.

Typical levels on delivery to a customer are around 250 ppm, but after processing this drops further to somewhere between 0.5 and 20 ppm by weight, depending on the fabrication involved.

Table 1: UK use of PVC in 1973

Application	Tonnage used	Main uses	Market penetration %
Pipes & fittings	100 000 (30 000 miles of pipework)	Water mains, rainwater pipe, soil pipe, electrical conduit	30 90 75 25
Electric cables	48 000	House wiring, motor vehicles, domestic appliances, power cables	100 100 70-80 40-50
Hard flooring	130 000	Tiles & continuous vinyl flooring	60
Packaging (a) Foil & film	24 000	Foil: margarine tubs, biscuits, chocolates Film: fresh meat & vegetables	
(b) Bottles	13 000 (400m. bottles)	Fruit squash, cooking oil, sweet jars,	20-25 60 50
(c) Bottle closures	5 000	food and drink products	30
Records (phonographic)	21 000 (140m. records)	all records are PVC	100
Cars	20 000	Upholstery, roof interiors	95
Footwear	20 000 70m. pairs	Shoes (35%) and shoe uppers	100
Colliery conveyor belting	6 000 (about 1 000 miles)	Underground safety belting	100

and overseas as well as with government departments, the actions necessary to safeguard the health of workers and users and to make recommendations for their speedy implementation."

A major reason for the committee's determination to arrive at a satisfactory solution to the VCM carcinogenity problem is the importance of PVC to the UK national economy.

Four companies, BP Chemicals, ICI, British Industrial Plastics and Vinatex (jointly owned by the National Coal Board and Conoco), produce 400 000 ton of PVC annually in the UK, involving 2 000 workers.

Table 1 shows the extent of the

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MINUTES

VINYL CHLORIDE/FDA MEETING

Shorham Americana
Washington, D. C.

September 10, 1975
10:00 A.M.

Attendees:

R. J. Abramowitz, Hooker Chemicals & Plastics, River Rd., Burlington, NJ 08016
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Flynt Kennedy, Continental Oil Co., P.O. Box 1267, Ponca City, OK 74601

Page Two
FDA/VCM Mtg.
9/10/75
cont'd...

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Judith Tins, Celanese Corp., 1211 Ave. of Americas, New York, N.Y. 10036
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Patricia Watson, Stauffer Chemical Co., Westport, Connecticut 06897
William Wetzels, Hooker Chemical, River Road, Burlington New Jersey
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- 1 - Mr. Ralph Harding, serving as Chairman, opened the meeting by asking for self introductions of those present. He then indicated that the proposed FDA rule on PVC for food packaging is a broad industry problem, not just a problem for producers of PVC resins.
- 2 - Mr. Heckman reviewed the background that led up to the present FDA proposal citing the following highlights:
 - FDA's concern over the prior sanction of PVC for food packaging goes back 2 - 3 years.
 - At the June 19, 1975 meeting of SPI's Food, Drug and Cosmetic Packaging Committee, Mr. Ronk indicated that FDA was continuing in its plan to issue a regulation that would call for no detectable VC migration into food simulating solvents using test methods sensitive to 50 ppb.
 - Health Research Group's petition of July 1, 1975 to ban the use of PVC for food packaging.
 - As a result of the HRG petition conflicts developed within FDA.
 - Mr. Heckman's meeting with FDA Commissioner Schmidt on July 18 to update him on the industry's activities.
 - Mr. Heckman's July 22 "confrontation" with Dr. Wolfe of HRG on WOR radio
 - FDA's publishing its three tier proposed regulation on PVC for food packaging on September 3.
- 3 - Mr. Heckman outlined a strategy that industry might follow to encourage FDA to allow the continued use of PVC for rigid food packaging on the same basis as FDA's logic in allowing the continued use of plasticized PVC in films, gaskets, can linings, etc. This would require industry to develop data to show no detectable migration from rigid packaging materials into food simulating solvents.

In following this strategy, Mr. Heckman pointed out the desirability of meeting the 60 day deadline for comments (November 3) if at all possible. This would require data to be available by October 3 so that it could be reviewed and put into proper form for submission to FDA.

If necessary, Mr. Heckman indicated that an extension on the November 3 deadline could be requested. Also he recommends that a hearing be requested if FDA does not respond in a satisfactory manner to the data the industry submits.

Mr. Heckman pointed out the importance of using consistent procedures in gathering data for submission to FDA.

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- 4 - Dr. Rinehart of Ethyl Corp. reported on the August 8 visit of the SPI Ad Hoc PVC Toxicology Committee with representatives of FDA to discuss protocol for VC feeding studies. FDA representatives made a number of observations about the proposed protocol that would require careful review before any such studies were initiated. FDA further indicated no degree of urgency in initiating such studies at this time.

Dr. Rinehart indicated that the MCA committee working on toxicity of VC is willing for SPI committees to pick up its various programs if they so desire.

- 5 - Mr. Nesbitt reported on the activities of the Plastic Pipe Institute's technical committee working on FDA and EPA issues. These include the following:

- Test method has been established.
- Future plans and anticipations:
 - a- Notify FDA by 9/12/75 that studies are under way.
 - b- Lowest level of VC in pipe is expected to be 1 ppm.
 - c- PPI will represent members and non-members in establishing FDA's criteria as called for in proposed regulation.
 - d- Intend to establish that VC does not become a component in drinking water.
 - e- Action Committee will prepare a report for PPI review by approximately October 13.
 - f- FDA jurisdiction over drinking water will be considered after data are collected.

- 6 - The meeting was divided into working groups to discuss procedure for gathering data in four product areas and to plan legal strategy as follows:

	<u>Chairmen</u>
Plastic Bottles	Frank Harris
Sheet and Blister Pack	Bill Gort
Plastic Pipe	Bill Nesbitt
Plasticized Products	A. W. Sheldon
Legal Committee	Jerry Heckman

Each of these groups subsequently reported back to the entire group as follows:

Plastic Bottles- Mr. Harris reported that the objective of this group would be to determine the level of VC that might be in the container wall that would not reasonably become a food component. The group will proceed to gather data and meet again on September 18 to review plans and start the preparation of a statement on its work.

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Sheet and Blister Pack- Mr. Gort cited the same objective as the bottle group and indicated that the next meeting of the group would be on September 22.

Plasticized Products- Mr. A. Sheldon reported that this group feels that no additional data will be submitted to FDA at this time but that they will proceed to reconfirm the logic of FDA's own findings. This group plans to meet again on September 23.

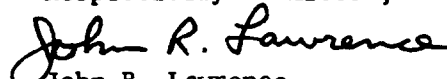
Plastic Pipe- Mr. Nesbitt had nothing further to report than covered in his earlier report.

Legal Committee- Mr. Heckman reported that the committee plans to meet on October 3 and expects to review the subcommittees' comments on October 13. It further plans to develop a draft of its comments to FDA for review by the Legal Committee, Chairmen of the four Product Groups plus two designated members, also Chairmen of VCM/PVC Producers Group, PPI, PBI, FDC, PMC. This draft is targeted for October 20 unless it is later deemed that an extension should be requested.

Mr. Heckman further stated that any individual company may file its own Food Additive Petition. If this is done, it would be advisable to be alert to the contents of the petition with respect to what other companies are producing of a similar composition and intended use.

- 7 - Mr. Harding indicated that it would probably be necessary to appoint a Steering Committee to expedite industry action. The meeting adjourned at approximately 3:00 p.m.

Respectfully submitted,


John R. Lawrence
Technical Director

JRL:je

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