8-28-75

PROPOSED INDUSTRY POSITION PAPER TO BE USED WITH CUSTOMERS

In the last two years, since it first became known that vinyl chloride monomer (VCM) could migrate from polyvinyl chloride (PVC), great strides have been made toward the elimination of the migrating vinyl chloride through the reduction of vinyl chloride monomer in the plastic.

PVC material being produced today for food packaging applications contains less than 1 ppm of vinyl chloride which results in non-detectable levels of the monomer in food simulating solvents using an analytical method sensitive to 50 ppb. Recent research conducted on animals suggests that there is a metabolic threshold above which the body's normal detoxifying defense mechanisms are swamped. This concept is consistent with all of toxicological data presently available. Furthermore, the threshold appears to be far above the amount that could conceivably be obtained from present day PVC materials containing less than 1 ppm of the monomer.

Recent statements made by one of the Nader groups on the migration of vinyl chloride from PVC were based on data that is completely out of date since it refers to PVC materials containing hundreds of ppm of vinyl chloride. Public concern and technicalities of the law may result in long deliberations including legal action before the issue of the use of PVC for food packaging is completely resolved. It is our considered opinion, one that we believe is shared by many technical persons both in other companies and in official agencies, that the trivial amount of VCM residual in currently produced PVC food packaging materials does not constitute a health problem.

The Society of the
Plastics Industry, Inc.

355 Lexington Avenue
New York, New York 10017
(212) 573 9400

SPECIAL SPI MEETING

Re: FDA Proposed Regulations
Concerning Vinyl Chloride and Polyvinyl Chloride

Shoreham-Americana Hotel
Washington, D. C.

September 10, 1975
10:00 a.m.

A G E N D A

1. Self Introductions and Introductory Remarks . . . . . Mr. Harding

2. Background and Explanation of FDA Proposal; Potential Courses of Action . Mr. Heckman

3. Report of Ad Hoc Toxicological Task Force . . . . . Mr. Rinehart

4. Formation of Special Committees:

   a. Plastic Pipe . . . . . Mr. Nesbitt

   b. Sheet and Blister Pack . . . . Mr. Gort

   c. Plastic Bottles

   d. Plasticized Products, Can Enamels and PVC Adjuvants

   e. Legal Strategy Committee

5. Deadlines and Plans Ahead

recognized that in view of the estimated substantially increased cost, we should provide as much information about the protocol, as is possible, at this time.

The meeting was adjourned at 12:30 sine die.

Respectfully submitted,

Thomas J. McGrath
General Manager

TJMcG/pb

SP

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

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

MINUTES

AD-HOC VCM FEEDING TASK FORCE

Keller and Heckman
Washington, D. C.

September 5, 1974
10:00 a.m.

Attendees:

William Rinehart, Chairman, Ethyl Corporation, 451 Florida Avenue, Baton Rouge, La. 70801
Daniel Dixler, Keller and Heckman, 1150 17th Street, N.W., Washington, D. C. 20036
A. B. Lindquist, Stauffer Chemical Co., Westport, Conn. 06880
Ken Morgareidge, Food & Drug Research Lab., Waverly, N. Y. 14892
(Mrs.) Jessie Norris, Dow Chemical Co., Midland, Michigan 48640
Charles J. Spiegl, Continental Can Co., 7622 S. Racine Avenue, Chicago, Ill. 60620
Thomas J. McGrath, General Manager, SPI, 250 Park Avenue, New York, N. Y. 10017

cc: A. W. Sheldon, M & T Chemicals Inc., P. O. Box 1104, Rahway, N. J. 07065

The attendees unanimously elected Bill Rinehart as chairman. Mr. Rinehart said that the purpose of the meeting was to review the preliminary report from Food and Drug Research Laboratories Inc. on the feasibility study of feeding vinyl chloride monomer.

Each member presented their opinion and recommendations about the feasibility study. During the review, Ken Morgareidge brought to the committee's attention Carrol Weil's, Union Carbide Corporation, comments about the protocol. Mr. Weil's comments were reviewed by the members and they agreed that the present feeding method under consideration appears to be the most suitable.

During the discussion, Mr. Morgareidge advised that due to the OSHA requirements regulating the handling of VCM, he will have to physically modify his laboratory as will other labs. which handle VCM.

In addition, it was the consensus of the committee that in view of OSHA we may have to extend the study beyond feeding.

These considerations substantially changed the financial aspects of the program. Originally, the cost estimates were $170,000. It appears that we now should talk in terms of $400,000.

Mr. Morgareidge, based on the comments of today's meeting, will re-write the protocol and the feasibility study. It is recognized by the members that a pilot testing program is required to finalize the protocol. However, it was further

F-SPI-PAC PVC FD

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A G E N D A

INFORMAL MEETING TO DISCUSS PUBLIC RELATIONS ASPECTS OF THE VINYL CHLORIDE QUESTION

September 3, 1975

1. Introductory remarks.....Nesbeitt
2. Up-date on FDA proceedings.....Heckman
3. Review of publicity on VC issue.....Durazo
   a. Potential impact on pipe markets
4. State-of-the-Art on VC detection capability....Mruk
5. Proposed field sampling program.....Durazo
6. General discussion
7. Adjournment