

Cliff Lee

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Manager's Notice
No. 922
January 23, 1974

Subject: NEWS RELEASE

The Company made the following news release shortly before 10:00 a.m. today;

AKRON, Jan. 23 -- The B.F. Goodrich Company today reported that it informed Kentucky health officials and the Federal National Institutes of Occupational Safety and Health that the Company is investigating whether the cancer deaths of three employees in the polyvinyl chloride operations at its Louisville, Ky. plant were related to occupational causes.

Dr. Maurice N. Johnson, the Company's director of environmental health, said he had recently received medical reports concerning the death of an employee late in December. A review of medical records uncovered that two other employees had apparently died from the same cause -- one in September, 1971 and one in March, 1973. The reported causes of death are subject to verification.

"Awareness of this grouping," said Dr. Johnson, "warranted a thorough investigation and prompt notification of the two government agencies most directly concerned."

The B.F. Goodrich Company has been conducting programs to reduce exposures to hydrocarbons, particularly vinyl chloride, throughout its operations. While all plants were operating at levels well below those prescribed by Federal Government standards, a successful effort has been made to reduce levels in these plants to approximately one-tenth those specified.

These efforts have included development of the most sophisticated monitoring systems now known; strict rules on procedures where exposure might be increased; a complete checking of all pipes, valves and similar equipment to prevent leaks, and extensive improvements in ventilation systems.

"The death in December, considered in relation to the two previous similar cases, has caused us to initiate intensive investigations throughout the vinyl products operations of the Company," Dr. Johnson said.

"To be sure we get the best independent evaluation and guidance, the Company has engaged Tabershaw-Cooper Associates, Inc. of Berkeley, California. Dr. Irving R. Tabershaw, one of the country's foremost experts in the field of public and occupational health and safety, is supervising the work of this consultant firm," Dr. Johnson said.

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The Company has instituted a program of explaining the new information and steps the Company is taking to all employees involved in vinyl products production. In addition, the Company has put into action a program to reduce exposures to vinyl chloride and other hydrocarbons to the minimum possible in all vinyl operations. Operations of the plants are continuing under the program of minimum exposure levels.

"We are providing medical examinations to all employees involved in any phase of vinyl chloride or polyvinyl chloride production and reviewing available medical records of any deceased former or retired employees," Dr. Johnson said.

"We have assured officials of NIOSH and the State of Kentucky that we will continue to provide them with any significant new information as it develops, he said.

You are encouraged to communicate the above to your employees today -- prior to their learning it from the public media.

If you receive inquiries from the news media, you are to limit your response to the following:

"The information that was released today concerns our plant at Louisville. Because of the complexity of the story, all inquiries are being handled in Akron. Please give me your name, phone number, who you represent, and your question. I will make sure that you receive a call from our headquarters in Akron."

Any such questions are to be relayed to W. Thomas Duke in our Akron office, Ext. 393



A. Vittone
President
B.F. Goodrich Chemical Company

Distribution: Cleveland Office
Plants (TWX)
Technical Center (TWX)
Sales Offices (TWX)

Management COMMUNICATOR

Henry Plant

file
Plant Comm.

Subject	<u>OSHA INSPECTION</u>	Date	11/8/74
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The Henry Plant was inspected on November 5th. and 6th. by three Federal Compliance Officers. Their main interest was VCl exposure. They were very complimentary about our Safety Program.

Citations are as follows:

- (a) An alpha methyl styrene drum on the third floor of the Poly Building did not have a ground strap on it.
- (b) One stack of skids in the PVC Warehouse was leaning excessively.
- (c) Housekeeping deficiency on the third floor of the Poly Building because hoses were left on the floor in walk ways.
- (d) When the sample analysis is complete we will know if a citation will be received on excessive VCl exposure.

(a, b and c above have been corrected)

Fifteen personal samples were taken with a Model SP-1 Sipin personal sampler pump and charcoal filters. We duplicated all samples exactly and will have our own results before we receive the OSHA report. Three samples each were taken on the following people: (a) two pearl charge operators, (b) one paste charge operator, (c) the PVC tank farm operator, (d) an operator doing housekeeping in the Dryer Building.

General discussion topics involving no citation are as follows:

- (a) Approximately ten PVC operators had private talks with Mr. Knarr. He was impressed favorably and commented on their good attitudes toward safety and thought they were well informed on things in general.
- (b) Any bulk PVC should be covered or removed from the area (Poly Building).
- (c) The PVC build-up which is being chipped from the valves

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contains quite a lot of VCI. We will do personal monitoring on these people.

- (d) The inspectors were favorably impressed with our operating procedures in general but felt we needed to do a better job of implementing them.
- (e) Noise measurements were taken but no mention was made of this in the wrap-up session.

If anyone has any questions involving this inspection, please refer them to me.

Ray Ehnlc,
Safety Engineer

RE:bkw

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Ed J. Wilent

Management COMMUNICATOR

Henry Plant

LOUISVILLE, Ky., March 13 -- A medical research program on angiosarcoma and related liver abnormalities is being organized by the University of Louisville's Health Sciences Center and Cancer Center under a grant from The B.F. Goodrich Company.

Details of the program and Goodrich support for it were announced at a news conference today by Harold Boyer, D.D.S., Vice President for Health Affairs, University of Louisville.

"This grant affords the opportunity to serve our community by bringing to bear our already-existing scientific expertise and research methods in regard to the apparent occupational health problem that has developed here in recent weeks," Dr. Boyer said. "It is our goal to provide medical information that can be applied practically in the detection and treatment of liver ailments that may have resulted from worker exposure to vinyl chloride."

Specific objectives have been established for the program, according to Arthur H. Keeney, M. D., D. Sc., Dean of the School of Medicine, they are:

- *to develop and implement medical examination and screening procedures.
- *to establish a registry which will be a computerized data bank containing all information pertinent to incidences of liver disease and angiosarcoma.
- *to conduct clinical research and basic research programs directly related to the problem of angiosarcoma and related liver diseases through existing Cancer Center procedures.

"The first year of the program will cost an estimated \$300,000," said Keeney, "and will be funded to this amount by The B.F. Goodrich Company. However, it is conceivable that this program would lead to expanded medical studies on angiosarcoma and other liver diseases, for which broader, additional, support from various sources would be sought, as necessary."

"We will appoint a clinical coordinator for this project, establish a project office and set up review boards composed of medical and scientific specialists to review progress and procedures being used," he said.

Dr. Keeney said close liaison will also be maintained with Dr. John L. Creech, Louisville B.F. Goodrich plant physician, and Dr. Maurice N. Johnson, the company's corporate director of environmental health, who is responsible for occupational health in all B.F. Goodrich facilities. Dr. Creech will serve on one of the review boards for the project.

Speaking for the company, Dr. Johnson said:

"Dr. Creech's discovery of several cases of angiosarcoma at our Louisville polyvinyl chloride operations and subsequent developments indicate the need for broad scientific inquiry into the possible causes, detection and treatment of this disease.

"Our goal, he said, "is to do everything possible to resolve this problem and to prevent its recurrence. The funding of this project is one step toward that goal."

"We are fortunate that here, where this problem first surfaced, we have the University of Louisville Health Sciences Center and its fine faculty, many of whom have through the years been engaged in research which will provide knowledge helpful in a study of this kind. The Health Sciences Center and the Cancer Center are well staffed and equipped to work on this problem."

Although the initial program will concentrate primarily on the Louisville situation, the discovery of angiosarcoma deaths by three other polyvinyl chloride manufacturers, after B.F. Goodrich's initial announcement, demonstrates the industry-wide scope of this problem.

It was noted that full use will be made of other resources which may have information relating to this research.

This would include the National Institute of Occupational Safety and Health, the National Cancer Institute and the Center for Disease Control, all under the U.S. Department of Health, Education and Welfare; the Kentucky Department of Labor; the Manufacturing Chemists Association, and programs sponsored by organized labor, among others.

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RECORDED

W. H. Wilcox
Comm.

Management COMMUNICATOR

Henry Plant

April 17, 1975

MEETING WITH ENVIRONMENTAL PROTECTION AGENCY

On Wednesday of last week (April 9th) two representatives of the U.S. Environmental Protection Agency - Air Standards Section - met at the Henry Plant with three Company Engineers from Cleveland and Henry plant personnel. The purpose of this meeting was to provide information for the two USEPA representatives on PVC plant operations and action taken by the plant to solve vinyl chloride emission problems.

This information will be used to help the USEPA draw up rules which will apply to losses of vinyl chloride which effect people beyond the company property line. OSHA rules presently in effect apply only to personnel within the plant site.

Selection of the Henry plant for this meeting is a recognition of the progress made in lowering vinyl chloride exposure levels during the past year. It is our feeling that the meeting was successful and the standard which will result will be reasonable and will provide adequate protection for any person living in the vicinity of a PVC plant.

A. W. Otto

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W. J. Walley

Management COMMUNICATOR

Henry Plant

October 3, 1974

Subject: GOODRICH STATEMENT ON OSHA STANDARD

AKRON, Oct. 2 -- The B.F. Goodrich Company said today the record of hearings conducted by the Occupational Safety and Health Administration (OSHA) does not support the necessity nor the feasibility of the permanent standard for exposure to vinyl chloride (VC) in the work atmosphere of VC and polyvinyl chloride (PVC) plants.

Goodrich said its comments are based on a preliminary analysis of the permanent standard which was announced Tuesday afternoon by OSHA.

The Company said it intends to continue all plant operations and also seek further reductions in the low levels of VC exposure achieved through intensive efforts over the past several months.

Goodrich said it will do whatever is required to sustain its operations, but the company intends to seek legal review of OSHA's final standard.

OSHA's standard, effective Oct. 4, has three phases. The current exposure limit of 50 parts-per-million (ppm) will continue until Jan. 1, 1975.

Thereafter, the standard will require that VC exposure levels be reduced to one ppm averaged over any eight-hour period and five ppm averaged over any period no longer than 15 minutes.

For higher exposure levels, the standard requires that employers provide certain respiratory devices for employees, but OSHA says the wearing of respirators, until Dec. 31, 1975, 'shall be at the discretion of each employee for exposures not in excess of 25 ppm.' The use of respirators will be mandatory after Jan. 1, 1976, whenever VC exposure exceeds the allowable levels of one and five ppm.

Goodrich said these levels were established arbitrarily and are not supported by the record of OSHA hearings conducted in February and this summer.

Technology to attain these levels does not exist today, Goodrich said. Therefore, the full-time use of respirators by all employees would be required in 1976.

There was ample evidence submitted by industry and other expert witnesses at the OSHA hearings this summer, the company pointed out, on the impracticality of using respirators on this basis.

Goodrich said it has already lowered the average VC exposure levels in its plants from 35-40 ppm early this year to an average of 12-13 ppm. This is acknowledged in OSHA's review of its permanent standard.

The Company said it has reached the point where additional improvements come harder and take longer to achieve.

It is not a question of economics, Goodrich said. These efforts have the company's highest priority.

The challenge now, the company's statement continued, is to develop and prove out new technology which, of course, cannot be predicted nor scheduled according to an arbitrary timetable.

Efforts will continue, the company added, to enable Goodrich to meet the steadily growing demand for the numerous applications of PVC, many of which are vital to the national economy.

Goodrich is committed to achieving the lowest practicable exposure levels for vinyl chloride as quickly as this is technologically feasible.

20288002

W. J. Wilkey

Management COMMUNICATOR

Henry Plant

February 20, 1974

I received the following information this morning from our Cleveland headquarters:

"The Company has temporarily reassigned 15 Louisville plant employees to jobs without exposure to Vinyl Chloride or other chemicals associated with the polymerization of Vinyl Chloride. This was done upon the recommendation of medical authorities after blood retesting continued to show abnormal liver function results, and is precautionary in the interest of health protection".

The blood tests run so far have not indicated any serious problems at this plant. I will give you information when they are all completed.

Charlie Cooper

CBC:vck

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W. J. Wallace

Management COMMUNICATOR

Henry Plant

February 19, 1974

We wish to inform our people that as soon as arrangements can be completed we will institute a "Trial Period" of furnishing work uniforms and requiring mandatory showers for all of our wage employees and all of their immediate supervisors. This is being provided in an effort to comply with recommendations of The National Institute of Occupational Safety and Health (NIOSH) made recently to other PVC Plants.

Work uniforms will consist of trousers without cuffs and long-sleeve shirts and enough sets shall be provided to allow the use of a newly-laundered uniform daily. Locked compartments for the storage of clean and dirty uniforms in the plant shower facilities will allow the issuance of individualized uniforms with different color combinations to most departments.

These uniforms will remain the property of the Henry Plant and shall not be removed from the premises. Exceptions to this requirement are employees leaving the plant for direct plant business or in event of injury or emergency.

Plant policies will soon be finalized to set forth the various considerations of these conditions of plant employment.

An explanatory letter shall be mailed to employees homes to explain these and other recent developments concerning our efforts to safeguard our employees health.

Representatives from the Chas. Todd Company will be in the plant Wednesday morning and Thursday to measure employees.

C. B. Cooper

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Management COMMUNICATOR

Henry Plant

February 15, 1974

The Following was Released to the Press Today:

Washington, Feb 15--B.F. Goodrich recommended today that new safety standards and work practices for the greater protection of employees in Polyvinyl Chloride production operations should be developed through regular rule-making under Section 6/B / of the Occupational Health and Safety Act.

Anton Vittone, Jr., President of B.F. Goodrich Chemical, a Division of The B.F. Goodrich Company, detailed the firm's views in a statement prepared for a fact-finding hearing conducted here today by the Occupational Safety and Health Administration (OSHA) of the U. S. Department of Labor.

The hearing was called following the Company's reports last month that it had discovered and was investigating the possible occupational relationship of the death of four former Polyvinyl Chloride (PVC) production employees from a rare type of liver cancer, angiosarcoma.

"Our discovery of four deaths from a rare type of liver cancer among employees at our Louisville plant was, to our knowledge, the first evidence indicating a possible relationship between human angiosarcoma and hydrocarbons used in the production of Polyvinyl Chloride resins" Vittone added.

The four men were employed at the Company's Louisville, Ky., PVC operations. They were long-service employees with an average exposure of 19 years to Vinyl Chloride and other secondary chemicals in PVC production.

Vittone emphasized that the Company's efforts to maintain a safe working environment over the years have "resulted in decreasing levels of exposure with time".

He said the Company independently and through the Manufacturing Chemists Association had stepped up its precautionary safety activities and research after European studies indicated that tumors could be produced in rats at exposure levels far above those prescribed for PVC plant working conditions.

Through these and other safety efforts Vittone added the Company has reduced exposure levels in all its PVC operations below 50 parts-per-million, equivalent to five one-thousandths of one percent weight in the air, on a time-weighted average.

He said this improvement was made through the use of new equipment, safety education for employees and the Company's development of advanced monitoring systems.

Upon discovery of the four deaths of angiosarcoma of the liver, Vittone said he and other top Corporate Officers "inspected the Louisville plant to observe current work practices and exposure levels".

As a result of these inspections and consultation with medical advisors he added the Company concluded that "the existing situation warranted continued operation of the Polyvinyl Chloride facility".

The current situation was also discussed with plant employees, Union representatives and Government officials he added.

The veteran chemical manufacturing executive said Goodrich "will do all it can to protect the health and safety of its employees".

He said the Company has reliable monitoring procedures which are being improved and that most interim work practices recommended recently by the National Institute of Occupational Safety and Health are being implemented at the firm's five PVC plants and one Vinyl Chloride production facility.

Vittone also said the Company's medical representatives are working closely with Government and other medical authorities to specify the best possible medical screening and testing procedures for PVC production workers.

He also reported that the Company and its medical consultants are analyzing the results of an extensive liver function testing program among all its PVC workers.

Vittone said it would be premature to report specific results or to provide any statistical analysis of the correlation with chemical exposures until a medical review is completed.

Vittone said the Company has found no other cases of angiosarcoma in its preliminary review of available medical records of deceased employees and retirees from the Louisville plant and the company's other Polyvinyl Chloride and Vinyl Chloride monomer production facilities. This review is continuing.

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Management COMMUNICATOR

Henry Plant

February 14, 1974

To: All Henry Plant Supervisors (Also post on Bulletin Boards)

On January 24, 1974, a walk through survey of the Louisville Plant was conducted by representatives of the National Institute for Occupational Safety and Health (NIOSH), the Kentucky Department of Labor, the Occupational Safety and Health Administration (OSHA), and the Epidemic Intelligence Service (EIS) of the Center for Disease Control (CDC).

In a letter to Mr. George E. Best of the Manufacturing Chemists Association, Dr. Marcus M. Key, Assistant Surgeon General of the United States and Director of NIOSH, commended the B.F. Goodrich Chemical Company for its "excellent cooperation with the survey team". He stated "the agreement of officials of the Louisville facility to provide continuing cooperation with the organizations participating in the survey, demonstrated the sincerity and concern of the B.F. Goodrich Chemical Company in determining the significance of past and present conditions of employment which may have precipitated or initiated the induction of tumors in certain of its employees". Dr. Key went on to say, "had not the Company taken the initiative it did in following up the suspicions aroused by the occurrence of the rare type of liver cancer (i.e. Angiosarcoma) discovered in several of its employees at autopsy, it is entirely possible that the significance presently attached to the appearance of those tumors would not have been realized for several more years."

Attached to the letter to the Manufacturing Chemists Association was a list of recommended preliminary work practices and monitoring and control procedures for the polymerization of Vinyl Chloride. Some of the recommendations made are already standard operating procedure at the Henry Plant. A copy of the recommendations are attached and at this time they are "recommendations" only.

As always, safety precautions will involve some inconveniences and possibly some discomfort. The continued help and cooperation of you and all of your operators is needed as we work together to further reduce personnel exposure to Vinyl Chloride, and other chemicals, improve our work practices, and our method of operation in general. Collectively this job can be done.

C. B. Cooper

CBC:vck

20295001

PRELIMINARY RECOMMENDATIONS MADE TO THE LOUISVILLE, KENTUCKY PLANT MANAGEMENT BY NIOSH

Recommended Precautionary Monitoring and Control Procedures for the B.F. Goodrich Chemical Company, Louisville, Kentucky

I. General Housekeeping Procedures

Until the etiologic agent(s) is identified, all materials connected with the polymerization process must remain suspect.

- A. The spillage of VC and PVC in and around the Louisville facility should be controlled.
 - 1. Housekeeping should be improved to assure immediate removal of VC and PVC material around polymerization operations including drying, packaging and rail loading operations.
 - 2. Recovered PVC material which is to be packaged should be stored in closed containers.
 - 3. Waste PVC material should be stored in closed containers and consideration should be given to the adequacy of its disposal and/or destruction.
- B. Inventories of beginning and recovered quantities of VC and quantities of PVC produced, packaged and recovered should be made to determine losses and probable areas affected.
- C. PVC material should be removed from overhead structures and conduits where it tends to collect.
- D. Consumption of food should be permitted only in the facilities presently provided for this purpose, and no food products should be permitted elsewhere in the facility.

II. Protective Clothing

- A. A daily change of protective clothing including full coveralls, or the equivalent, should be provided each employee in areas where possible exposure to VC-PVC could occur. Clothing contaminated by accidental spills should be changed as soon as feasible.
- B. Protective gloves and footwear, or footcovers, should be worn as appropriate in those PVC operations where exposure to PVC material is possible.
- C. Protective head covers should be worn during PVC operations as appropriate (e.g. hard hats in those areas where physical protection of the head is necessary and skull caps, or the equivalent, in operations such as cleaning of polymerization reactor tanks and packaging operations).
- D. Employees engaged in maintenance and cleaning operations of polymerization reactors tanks should wear full impervious suits to guard against skin contact of PVC material and VC vapors. Procedures for safe entry to confined spaces should be observed.

III. Showers

Showers at the termination of an eight-hour work shift would be mandatory for all workers with possible contact with VC-PVC.

IV. Monitoring

A. Environmental Monitoring

- 1. The present environmental monitoring program should be expanded to include a survey of the VC concentrations in the polymerization reactors immediately after opening, immediately prior to entry of maintenance personnel and during the tank cleaning operation.
- 2. Data obtained from the present environmental monitoring program should be used to indicate those areas where the sampling ports of the new fixed monitoring system should be located.
- 3. The present program to control VC levels to below 50 ppm should be emphasized and efforts to further reduce these levels should be given consideration concomitantly with the necessary modifications in engineering and design controls.

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4. The concentration of VC in exhaust ventilation should be determined to estimate the amount of VC lost during operations and the possible exposure of personnel immediately outside the facility.
5. Monitoring for PVC particulate material should be accomplished to estimate the degree of exposure to this substance throughout the facility.

B. Personal Monitoring

1. Integrated, eight-hour personal monitoring samples should be obtained from those employees considered to receive the greatest exposure to VC or PVC.
2. Breathing zone samples should be obtained to complement the present environmental monitoring program for VC, and similar samples should be obtained for PVC.

V. Respiratory Protection

Because VC is a gas under ambient conditions and PVC is a solid under these conditions, it is recommended that respiratory protection for employees take these circumstances into consideration.

- A. Employees engaged in cleaning and maintenance operations inside polymerization reactors should be equipped with an atmosphere-supplied respirator in order to protect against both VC vapor and PVC particulates.
- B. During housekeeping procedures and packaging operations where the possibility of PVC dust inhalation is a factor, it is recommended that an air-purifying respirator equipped with a mechanical filter designed to remove particulate material be worn. Respiratory protective devices which meet this requirement, as well as protect against VC vapors in concentrations less than 0.1% have been approved by the NIOSH Testing and Certification Laboratory and bear the numbers: TC-23C-40, TC-23C-47, TC-23C-48.
- C. Employees engaged in transfer operations of VC from railway tankcars to storage facilities should wear a self-contained breathing apparatus (SCBA) during such operations to guard against unexpected release of VC during such operations.
- D. Other operations involving possible exposure to VC or PVC should be evaluated as the individual situation exists and respiratory protection provided as appropriate.

20295003

W. J. Wilcox

Management COMMUNICATOR

Henry Plant

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- *to develop and implement medical examination and screening procedures.
- *to establish a registry which will be a computerized data bank containing all information pertinent to incidences of liver disease and angiosarcoma.
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"Our goal, he said, "is to do everything possible to resolve this problem and to prevent its recurrence. The funding of this project is one step toward that goal."

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*To J. Wilent
Plant Comm.*

Management COMMUNICATOR

Henry Plant

April 17, 1975

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A. W. Otto

AWO:vek

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21119001

Managers' Notice - No. 941
Friday, March 1, 1974

BULLETIN

FOR THE SATURDAY NIGHT NBC-TV NATIONAL NEWSCAST
(MARCH 2), THE NETWORK HAS TENTATIVELY SCHEDULED A
REPORT ON THE VINYL CHLORIDE SITUATION AT B.F.GOODRICH
AND OTHER COMPANIES. IT IS EXPECTED THAT THE REPORT
WILL INCLUDE FILM FOOTAGE TAKEN AT THE LOUISVILLE
PLANT ON OUR PRECAUTIONARY MONITORING PROCEDURES AND
WORK PRACTICES. WE UNDERSTAND NBC NEWS HAS ALSO
INTERVIEWED GOVERNMENT OFFICIALS AND UNION REPRESENTATIVES
AT THE LOCAL AND NATIONAL LEVELS.

IF THE REPORT IS NOT SHOWN ON SATURDAY NIGHT
BECAUSE OF A SCHEDULE CHANGE, THERE IS A GOOD POSSIBILITY
IT WOULD BE INCLUDED IN THE NBC-TV SUNDAY NIGHT NATIONAL
NEWSCAST. (CHANNEL 3).

WE SUGGEST YOU CONSULT YOUR LOCAL TV LISTING
FOR TIME AND CHANNEL.

TOM BROOKAW IS THE REGULAR ANCHORMAN FOR NBC-TV
WEEKEND NEWS, SUBBING FOR JOHN CHANCELLOR. REBECCA
BELL IS THE REPORTER ON THE VINYL CHLORIDE STORY.

PUBLIC RELATIONS DEPARTMENT

NGC 02700

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B.F. Goodrich

Managers notice # 941

~~Kew-Forest, N.Y.~~

3-1-74

ALDC ✓

ALGC ✓

Pelham ✓

Calverton ✓

327 Henry ✓

Long Beach ✓

Louisville ✓

Port Rocher ✓

Orange ✓

Plattsburgh ✓

Hamming

LTC ✓

Akron ✓

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NGC 02701

W. J. Wilensky

Management COMMUNICATOR

Henry Plant

May 24, 1974

PROGRESS IN REDUCING VCL EXPOSURE

As you can see from the attached chart, our efforts to reduce the Vinyl Chloride in the Henry Plant working atmosphere have been successful. The Vinyl Chloride in the air of the Poly Building is now less than one fifth what it was four months ago!!! That is a tremendous improvement and many people contributed to this accomplishment. But, we won't stop here.

The present OSHA standard allows a maximum of 50 parts per million of Vinyl Chloride in the working atmosphere. The proposed OSHA standard required "no detectable level". Our Plant immediate goal is 10 ppm with further reduction as fast as we can improve techniques and equipment. Hearings are planned and BFG will participate in providing the facts to establish a reasonable permanent standard.

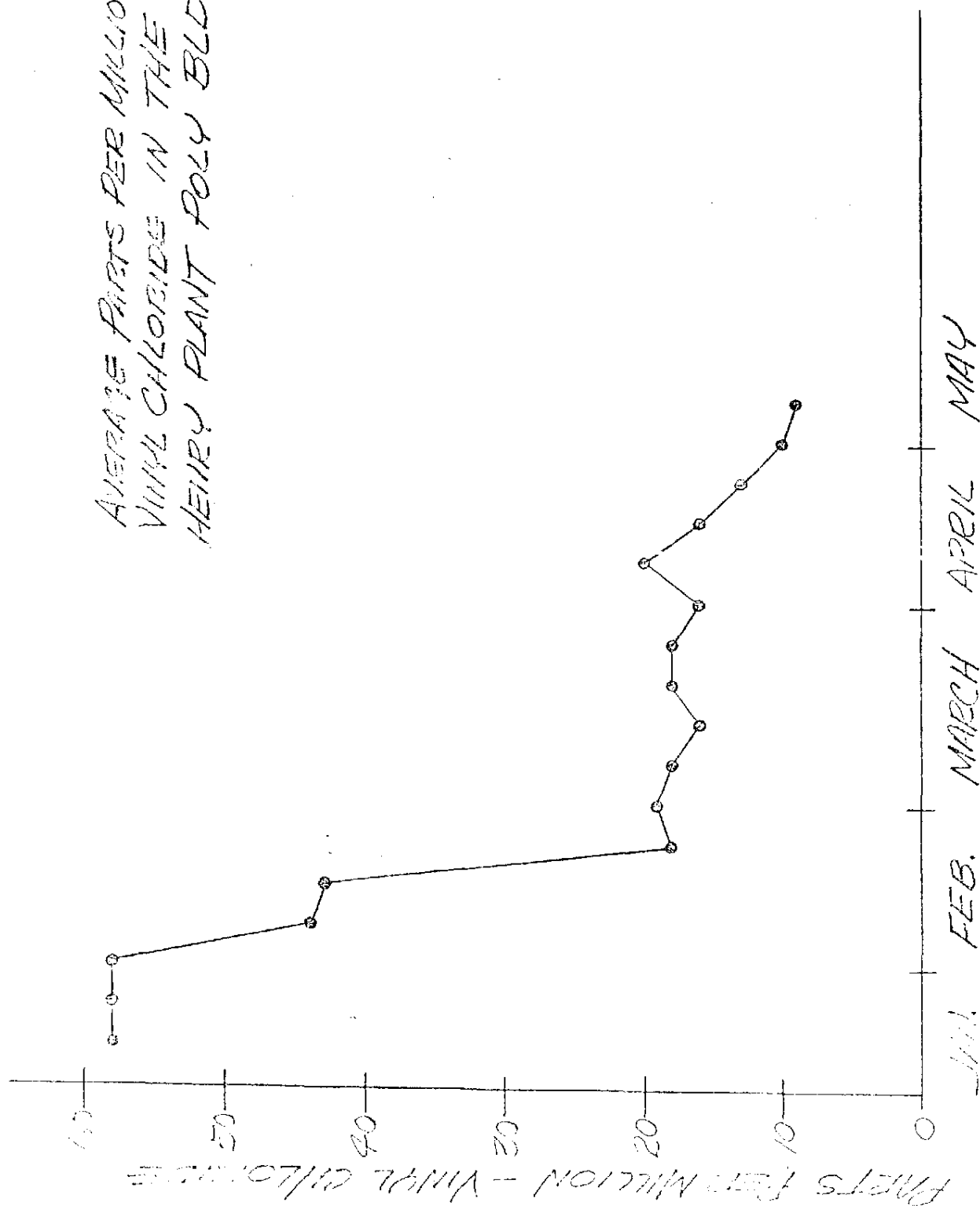
I am attaching for your information a News Release on this subject.

C. B. Cooper

CBC:vck

Attach - 2

AVERAGE PARTS PER MILLION
VINYL CHLORIDE IN THE
HENRY PLANT POLY BLDG.



1974

20002002

NEWS RELEASE FROM B.F.GOODRICH, DATED 5/23/74.

Akron. --The most intensive research and development program in its history, a multimillion dollar program in which more than 100 scientists, engineers and technicians are working to develop new technology, was announced today by B.F.Goodrich. Aim of the program is to reduce to the lowest possible level losses of vinyl chloride and thus, reduce exposure in manufacturing operations.

"Time is required to break technological barriers, to engineer, build and install new equipment", Anton Vittone, President of the Company's Chemical Division, said, "but incremental improvements can be expected on a continuing basis as our research and development efforts identify improvements that can be made in our plant operations".

"We are working on several programs on a six day and even seven day per week basis with our most capable, dedicated and highly skilled people".

"These programs include moving toward a more automated 'closed' system, which we believe will substantially reduce vinyl chloride losses and exposure".

A careful, in-depth analysis of the proposed permanent Occupational Safety and Health Administration standard relating to worker exposure to vinyl chloride is being made by the company. According to Vittone, "The proposed standard of no detectable level of exposure does not appear to be possible with the current state of technology and, if imposed, could displace not only the 6,500 vinyl chloride monomer and polyvinyl chloride (PVC) production workers, but also hundreds of thousands of other employees in the companies which use PVC.

"Industry, labor, government and the scientific community must continue to cooperate to make the most of our time and resources. All of us have a stake in the outcome of these efforts to assure the safety and well-being and continued employment of hundreds of thousands of workers".

"Given time we are confident we can develop the technology to assure safe limits without an undue disruption of jobs", Vittone concluded.

20000003

To J. Wilent file

Management COMMUNICATOR

Henry Plant

October 28, 1974

**** WORK CLOTHING ****

The new permanent standard issued by OSHA neither requires nor recommends daily change of work clothing in industries using Vinyl Chloride.

Effective today the policy of requiring that sleeves be rolled down and buttoned will be changed to mean that sleeves must be rolled down and buttoned when working around dangerous moving equipment, uninsulated steam lines or when there would be a change of burns from chemicals. The plant policy of requiring shirt tails "tucked in" remains in effect. The necessity of requiring shop-coats is eliminated.

C. B. Cooper
C.B. Cooper

CBC:mmm

NGC 02705

Communication Is A Part Of Everybody's Job !

28001001

W. J. Wilkey file

Management COMMUNICATOR

Henry Plant

October 3, 1974

Subject: GOODRICH STATEMENT ON OSHA STANDARD

AKRON, Oct. 2 -- The B.F. Goodrich Company said today the record of hearings conducted by the Occupational Safety and Health Administration (OSHA) does not support the necessity nor the feasibility of the permanent standard for exposure to vinyl chloride (VC) in the work atmosphere of VC and polyvinyl chloride (PVC) plants.

Goodrich said its comments are based on a preliminary analysis of the permanent standard which was announced Tuesday afternoon by OSHA.

The Company said it intends to continue all plant operations and also seek further reductions in the low levels of VC exposure achieved through intensive efforts over the past several months.

Goodrich said it will do whatever is required to sustain its operations, but the company intends to seek legal review of OSHA's final standard.

OSHA's standard, effective Oct. 4, has three phases. The current exposure limit of 50 parts-per-million (ppm) will continue until Jan. 1, 1975.

Thereafter, the standard will require that VC exposure levels be reduced to one ppm averaged over any eight-hour period and five ppm averaged over any period no longer than 15 minutes.

For higher exposure levels, the standard requires that employers provide certain respiratory devices for employees, but OSHA says the wearing of respirators, until Dec. 31, 1975, "shall be at the discretion of each employee for exposures not in excess of 25 ppm." The use of respirators will be mandatory after Jan. 1, 1976, whenever VC exposure exceeds the allowable levels of one and five ppm.

Communication Is A Part Of Everybody's Job!

NGC 02706

Goodrich said these levels were established arbitrarily and are not supported by the record of OSHA hearings conducted in February and this summer.

Technology to attain these levels does not exist today, Goodrich said. Therefore, the full-time use of respirators by all employees would be required in 1976.

There was ample evidence submitted by industry and other expert witnesses at the OSHA hearings this summer, the company pointed out, on the impracticality of using respirators on this basis.

Goodrich said it has already lowered the average VC exposure levels in its plants from 35-40 ppm early this year to an average of 12-13 ppm. This is acknowledged in OSHA's review of its permanent standard.

The Company said it has reached the point where additional improvements come harder and take longer to achieve.

It is not a question of economics, Goodrich said. These efforts have the company's highest priority.

The challenge now, the company's statement continued, is to develop and prove out new technology which, of course, cannot be predicted nor scheduled according to an arbitrary timetable.

Efforts will continue, the company added, to enable Goodrich to meet the steadily growing demand for the numerous applications of PVC, many of which are vital to the national economy.

Goodrich is committed to achieving the lowest practicable exposure levels for vinyl chloride as quickly as this is technologically feasible.

2000000000

W J Wilkey

Management COMMUNICATOR

Henry Plant

May 24, 1974

PROGRESS IN REDUCING VCL EXPOSURE

As you can see from the attached chart, our efforts to reduce the Vinyl Chloride in the Henry Plant working atmosphere have been successful. The Vinyl Chloride in the air of the Poly Building is now less than one fifth what it was four months ago!!! That is a tremendous improvement and many people contributed to this accomplishment. But, we won't stop here.

The present OSHA standard allows a maximum of 50 parts per million of Vinyl Chloride in the working atmosphere. The proposed OSHA standard required "no detectable level". Our Plant immediate goal is 10 ppm with further reduction as fast as we can improve techniques and equipment. Hearings are planned and BFG will participate in providing the facts to establish a reasonable permanent standard.

I am attaching for your information a News Release on this subject.

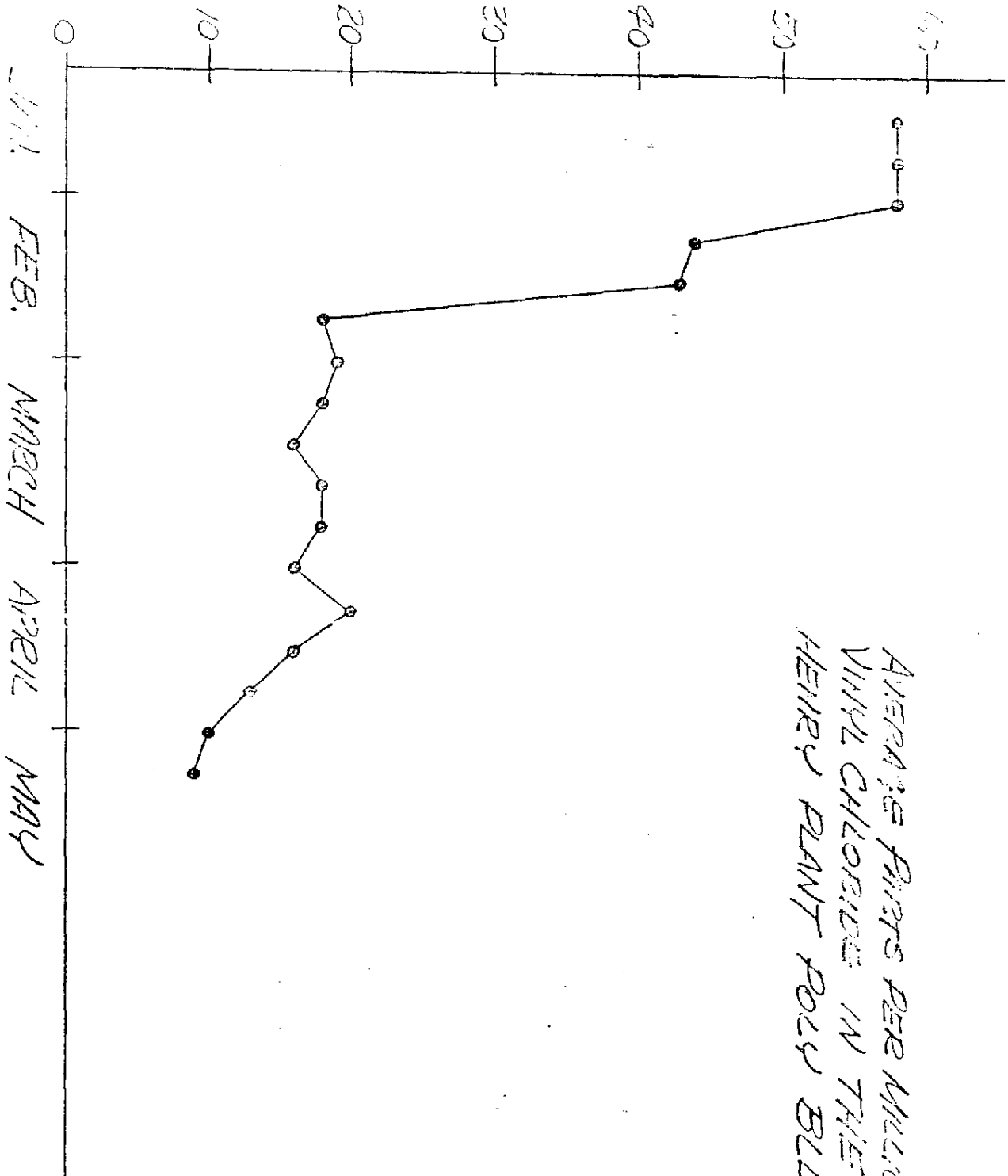
C. B. Cooper

CBC:vck

Attach - 2

20289001

PARTS PER MILLION - VINYL CHLORIDE



AVERAGE PARTS PER MILLION
VINYL CHLORIDE IN THE
HENRY PLANT POLY BLDG.

20289002

1974

Management COMMUNICATOR

Henry Plant

February 18, 1974

VINYL CHLORIDE EXPOSURE

Saturday afternoon I learned of another case of liver cancer at the Louisville Plant. This makes five known cases.

The new case was a man who died of other causes in 1964 and an autopsy showed some liver cancer. There are other investigations underway which may lead to further information which I will pass on to you as it develops.

All of the cases have been people working at the Louisville Plant and people who have worked in "cold rooms" where Vinyl Chloride levels are normally a thousand or more times greater than the normal exposure in our Plant.

Charlie Cooper

CBC:vck

20293001



B. F. Goodrich Chemical Company

A DIVISION OF THE B. F. GOODRICH COMPANY

6100 OAK TREE BOULEVARD

CLEVELAND, OHIO 44131

April 4, 1974

Dr. Carl Alper
116 So. 18th St.
Philadelphia, Pa. 19103

Dear Dr. Alper:

Attached is a copy of a memo that was sent to our plants at Avon Lake, Ohio; Calvert City, Kentucky; Henry, Illinois; Long Beach, California and Pedricktown, New Jersey. Based on my conversations with you and with Dr. C. Szustkiewicz, I believe this memo was self-explanatory. You should shortly be contacted by our representatives at these locations. As you requested, below are the names and addresses for each location and the approximate number of employees who will be included in the routine testing program.

Avon Lake General Chem. Plant (225)
P. O. Box 134
Avon Lake, Ohio 44012

Phone: (216) 379-3031
R. L. Cross

Avon Lake Development Center (50)
P.O. Box 122
Avon Lake, Ohio 44012

Phone: (216) 379-3031
C. A. Orben

Calvert City (300)
P. O. Box 527
Calvert City, Ky. 42029

Phone: (502) 395-4151
R. W. Edwards

Henry Plant (150)
R.R. 1, Box 15
Henry, Ill. 61537

Phone: (309) 364-2311
G. P. Smith

Long Beach Plant (75)
P.O. Box 9077
Long Beach, Calif. 90810

Phone: (213) 835-8354
W. L. Blount

Pedricktown Plant (125)
P. O. Box 400
Pedricktown, N. J. 08067

Phone: (609) 299-5400
W. A. Riley

...in pursuit of excellence

NGC 02711

We will also be utilizing your facilities for pre-employment physical examinations at these locations so the numbers indicated are probably conservative.

Sincerely,



W. J. Wilcox

/ml
Att.

cc: Dr. M. N. Johnson
Dr. R. A. Guyton

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