T. C. Culver - Atlanta
J. J. Ryder - Boston
D. A. Savage - Chicago
D. H. Hall - Cleveland
J. R. Paschall - Kansas City
G. D. Norman - Los Angeles
J. A. Binder - New York
C. A. Brown - Philadelphia

June 18, 1974

ORC Letter

We are actively soliciting the assistance of a select group of customers in obtaining information for use by OSHA in arriving at a reasonable standard for VCM exposure. The criteria for selecting the customers were that they:

1) Had been in business a minimum of 12-14 years.

2) Employed at least 100 people.

3) Were large enough to have own health department and/or an insurance carrier, either of which would have health records available.

Enclosed are copies of the form letter and two copies of the list of customers in your region that are to be sent the letter. Note that on the customer list, in some cases, we have suggested the name of the person to contact. If you have another contact at the particular account you wish to advise, please do so. Complete the customer list by filling in the name of the person or persons to whom the letter is sent and return one copy of the list to W. S. Lodge, for our records.

Would you also please see that each of your salesmen receive a copy of the letter and advise them the name of the company and person contacted for any of their customers involved in this mailing.

Please give this priority handling.

W. E. Bigley

WEB/cs

Enclosures

cc: W. S. Lodge
P. J. Weaver
H. L. Wuerth & National Acct. Mgrs.
J. F. Malone <- COPY FOR
R. L. Steller

B.F.Goodrich

B. F. Goodrich Chemical Company
A DIVISION OF THE B. F. GOODRICH COMPANY
6100 OAK TREE BOULEVARD · CLEVELAND, OHIO 44131 · PHONE: 216-524-0200

This letter is to ask for your further assistance in obtaining factual information for use by OSHA in arriving at a reasonable base standard for vinyl chloride monomer exposure that will give the worker adequate protection from undue work environment hazards. Specifically, we are asking your cooperation in a PVC processor epidemiological study to review all available death certificates and hospital records of people in plants with longer than 12 years operation. This study is aimed primarily at workers with more than ten years experience in such PVC processing plants. If you are already cooperating with the Organization Resources Counselors (ORC) in this study, we thank you for this support of the program.

A number of companies are concerned with possible impact of future government regulations which may be imposed for vinyl chloride exposure to workers in the PVC manufacturing and processing industries. We have retained ORC through their Washington, D.C. office, to conduct a mortality epidemiology study as quickly as possible. They have retained an eminent biostatistician, Dr. Leonard Chiasse of Georgetown University, to supervise the study. He has determined that the most rapid results can be obtained by reviewing death certificates available from life insurance companies and records of companies with substantial numbers of workers engaged in processing of PVC. We are asking your help, if you have not already done so, by communicating promptly with the ORC Washington office ---

Mr. Bill Nichols
ORGANIZATION RESOURCES COUNSELORS, INC.
Suite 212
1660 L Street, N.W.
Washington, D.C. 20036
(Telephone: AC 202/872-1080)

They will be happy to update you on the current status of the study and give you more information about the organization and its program to keep medical information on individuals confidential.

The following information will be helpful to them:

1) Identification of your manufacturing plants using PVC, by general processing method, plus the approximate number of workers now so engaged and the year such operation started, together with a list of employees formerly so engaged for at least ten years, who are known to have died.

2) Identification of your life insurance carrier (Group Plan) and letter to them requesting release of death certificate information of these past employees, including retirees, to ORC for the purpose of this study.

3) Since most life insurance carriers destroy their death certificate files after five to six years, ORC asks that each company search their own files for copies of death certificates or other leads that could assist in determining the cause of death - e.g. hospital of confinement, family doctor, etc. (Identification of hospitals and plant physicians that could be of assistance and appropriate introductions re the ORC effort are also solicited.)

4) Any information available on vinyl chloride monomer ambient air level in the worker area taken recently as a result of the OSHA emergency and proposed permanent standards. In addition, information on dates of installation of ventilating equipment to increase air changes in warehouses and mixing areas, if any.

We appreciate that this is a lot of extra work for you and that it involves confidential, past employee information. However, we believe that the effort will be worthwhile for you and your present employees since providing important information should enable OSHA to adopt a reasonable standard in the next few months.

We believe you will be interested in the results to date of the PVC producer industry studies relevant to this question. Vinyl chloride monomer concentrations have been determined recently by both worker sampling in accordance with the NIOSH preliminary recommendations and ambient air grab samples of work areas (gas chromatography). This has been done in PVC producing plants, as well as PVC processor plants. Past exposure levels have been estimated on the basis of a variety of less sophisticated methods.

1) Polymer producing plants - over 1000 ppm in the years 1945-1955
   400-500 ppm in the years 1955-1960
   300-400 ppm in the years 1960-1970
   50-150 ppm in the years 1970-1973
   less than 50 ppm now

2) Monomer producing plants have always been an order of magnitude lower than polymer plants in VCM exposure levels.

3) Recent tests in a variety of PVC processing plants as gathered by ad hoc committees have shown the following data, and an industry concensus will be presented to OSHA at the hearings scheduled to begin June 25:

3) - continued

Up to several hundred ppm in the air space above bulk shipment and storage units.

Up to 40 ppm (mostly less than 15 ppm) in non-ventilated bag warehouses.

Up to 40 ppm (usually less than 10 ppm) in insufficiently ventilated mixing areas with powder PVC.

Below 3 ppm and generally non-detectable in downstream processing lines.

It is evident that ventilation at the receiving and mixing area would minimize any worker exposure problem in PVC processing plants.

4) Through the administration of the Manufacturing Chemists Association, the VCM/PVC manufacturers have recently completed an epidemiological survey of some 8,300 of their present and past workers by Tabershaw/Cooper Associates, Inc. This study showed a lower mortality rate versus the control U.S. population (75%, or similar to normal industrial worker populations). The study found a total cancer incidence as cause of death comparable to the control population. However, there were some statistically questionable indications of a distortion in the distribution of types of cancer -- liver, buccal cavity and brain -- especially among workers exposed to higher levels of VCM for longer periods. The ORC study is designed to look at this latter finding in particular, assuming much lower but significant VCM exposure in processor plants during the same time period.

In summary, it is recognized that the ORC study may be deficient, since it must be rapid, will not count the actual population from which the deaths originated, and will fall short of the desired 95%+ count in an epidemiological survey.

We recommend your cooperation in this study in the interest of worker protection and decisions toward regulations for reasonable and feasible exposure levels during the next two or three years.

Sincerely yours,

W. S. Lodge
General Sales Manager

WSL/cs