

PO Box No 6
Bessemer Road
Welwyn Garden City Hertfordshire AL7 1HD

Telephone Welwyn Garden 23400 (STD Code 07073)
Telex 264251

From J Stafford
Health & Environment Protection

Imperial
Chemical
Industries
PLC

Petrochemicals and
Plastics Division

To	Dr T R Torkelson	Dow	Copies to M
	Dr M N Johnson	BF Goodrich	
	Mr J Lawrence	SPI	
	Mr J T Seawell	MCA	

Your ref	Our ref	Tel ext	Date
	JS/SEN/DSO-16	7535	21 June 1982

PVC DUST

I enclose for your attention a photocopy of a Guidance Note EH 31 issued by our government Health & Safety Executive on PVC dust. As I think I informed some of you we were quite happy with the Guidance Note except for the reference in paragraph 9 to the work of Waxweiler. Despite very strenuous representations on our part the HSE refused to remove the statement. Even though the statement is couched in vague terms about "the possibility" of an excess of lung cancers we imagine that we will be asked a lot of awkward questions by our people. However, we are prepared to do this.

Perhaps Dr Torkelson, as an expert adviser to the ACGIH, would feel it appropriate to give a copy to the ACGIH group which is considering PVC dust.



J Stafford

CONFIDENTIAL
Subject to Protective Order in
Ross v. Conoco, Inc., No. 90-4937
14th Judicial District Court
Calcasieu Parish, Louisiana

CMA 006075



**Health &
Safety
Executive**

25 Chapel Street
London NW1 4DT
Telephone 01-262 3277
ext
255

News Releas

14 June 1982

~~CONFIDENTIAL~~

Subject to Protective Order in
Ross v. Censco, Inc., No. 90-4937.
14th Judicial District Court
Calcasieu Parish, Louisiana

GUIDANCE ON CONTROL OF EXPOSURE TO PVC DUST

Advice on the control of exposure to Polyvinyl chloride (PVC) dust is given in a guidance note* published by the Health and Safety Executive (HSE) today.

The note draws attention to the possible health risks which could result from exposure to PVC dust and identifies those operations where exposure is most likely to arise.

The Health and Safety Commission's Advisory Committee on Toxic Substances has recommended that, in line with the Commission's general policy, exposure to PVC dust should be kept as low as is reasonably practicable; and in any case should not exceed $10\text{mg}/\text{m}^3$ for total PVC dust in air and $5\text{mg}/\text{m}^3$ for respirable PVC dust in air.

Recommended methods of sampling and measurement of both total and respirable PVC dust are described in the guidance note.

*'Control of Exposure to PVC Dust', (GN EH 31), available from HM Stationery Office or booksellers, price 50p plus postage. ISBN 0 11 883541 6.



Guidance Note EH 31 from the Health and Safety Executive

Environmental Hygiene 31 (May 1982)

These Guidance Notes are published under five subject headings: Medical, Environmental Hygiene, Chemical Safety, Plant and Machinery and General.

INTRODUCTION

- 1 This Guidance Note draws attention to the possible health risks which could result from exposure to polyvinyl chloride (PVC) dust.
- 2 The Health and Safety Commission's Advisory Committee on Toxic Substances has recommended that, in line with the Commission's general policy:
 - (a) exposure to PVC dust should be kept as low as is reasonably practicable;
 - (b) in any case exposure should not exceed 10 mg/m^3 for total PVC dust in air and 5 mg/m^3 for respirable PVC dust in air.
- 3 The effects of exposure to PVC dust are referred to in para 9 and advice is given on assessment and control in paras 10 to 13. Methods of sampling and measurement are described in paras 14, 15 and the Appendix.

MANUFACTURE AND USE

- 4 PVC is manufactured in the form of a white powder which softens at about 80 degrees centigrade. Before PVC is fabricated, various materials such as stabilisers, plasticisers and antioxidants are added.
- 5 It is manufactured from vinyl chloride monomer (VCM) mainly by a process in which liquified VCM in the form of a stirred suspension or emulsion in water is polymerised in the presence of an initiator which causes the VCM to polymerise. All PVC polymers contain traces of other reagents used in the polymerisation process to control the size and structure of the particles, e.g. emulsion polymers contain small quantities of emulsifying agents.
- 6 In its unplasticised form PVC is hard, tough, strong and has good chemical resistance. It is used for a wide variety of construction, domestic and engineering products including pipes, ducts, tanks, bottles and protective claddings.
- 7 In its plasticised form it is more flexible and is used as an insulation material for electric wires, as a coating for various textile products and for many other applications.

Control of exposure to polyvinyl chloride dust

CONFIDENTIAL
Subject to Protective Order in
Ross v. Conoco, Inc., No. 90-4837
14th Judicial District Court
Calcasieu Parish, Louisiana

8 Blends of PVC and nitrile rubbers (polyacrylonitrile/butadiene) are used to make rubber items such as hose, automotive seals, shoe soles, cable covers, etc., where the product requires good resistance to oils and the ability to withstand atmospheric attack.

EFFECTS OF EXPOSURE

9 Over the past decade attempts have been made to evaluate the toxicity of PVC dust which have involved 'in vitro' studies and studies on both animals and humans. In some studies on humans the effects of exposure to PVC dust were complicated by concurrent exposure to vinyl chloride monomer. Nevertheless, there is evidence¹ to indicate that PVC dust alone may be associated with respiratory dysfunction and radiographic changes and in one report² the possibility of an excess of lung cancer in exposed workers has been raised. The studies do not indicate the concentration of dust to which individuals had been exposed and consequently it is not possible to relate the specified effects to the degree of exposure.

ADEQUATE CONTROL OF EXPOSURE

- 10 Where exposure to PVC dust cannot be avoided, control should be achieved by material, plant and process controls or other suitable control techniques supplemented where necessary by the wearing of suitable respiratory and other personal protective equipment.
- 11 Personal exposure should not exceed 10 mg/m^3 for total PVC dust in air and 5 mg/m^3 for respirable PVC dust in air, 8 hour time-weighted average concentrations, and should be further reduced where reasonably practicable. Inspectors will use these exposure limits when assessing compliance with the HSW Act and relevant statutory provisions.

ASSESSMENT OF WORK

- 12 Work involving PVC should be assessed in order to identify sources of dust, to determine the levels of exposure and to identify any necessary improvement to existing controls or the provision of new controls. The work should be re-assessed whenever changes are introduced which significantly affect the material, plant or process controls.
- 13 In practice exposure to PVC dust in manufacturing or in user industries is most likely to arise during the following operations:

- (a) drying and screening, including cyclones,
- (b) handling, transfer and despatch operations,
- (c) bagging and weighing,
- (d) bag opening and powder transfer,
- (e) batch weighing,
- (f) mixing and blending,
- (g) finishing of PVC articles.

SAMPLING AND MEASUREMENT

14 Where the information available on the levels of exposure to PVC dust is not sufficient for the work to be properly assessed, or where exposure may be in excess of the limits referred to in para 2, the airborne concentration to which persons are exposed should be measured in order to:

- (a) verify whether the 8-hour time-weighted average concentration of PVC dust in the breathing zone exceeds these limits on a given occasion, and
- (b) monitor the effectiveness of material, plant and process controls.

15 The sampling strategy should be determined having regard to the nature of the work and the duration of exposure. The results obtained should be representative of personal exposure averaged over an 8-hour period. The measuring methods used by HSE for sampling total and respirable dust are described in the Appendix.

STATUTORY REQUIREMENTS

16 No specific regulations have been made under the Factories Act 1961 or the Health and Safety at Work etc Act 1974 to deal with exposure to PVC dust but control is required under the requirements of Section 2 of the HSW Act and Sections 1, 4 and 63 of the Factories Act.

REFERENCES

- 1 Soutar C A et al (1980) 'Epidemiological study of respiratory disease in workers exposed to polyvinyl chloride dust' *Thorax* 35, pp 644-652.
- 2 Waxweiler, R J et al (1978) XIX International Congress on Occupational Health, Dubrovnik.
- 3 Hamilton R J & Walton W H (1961) in 'Inhaled Particles and Vapours' (Ed. C N Davies) pp 465-475 (Pergamon, Oxford).
- 4 Orenstein A S (Editor) (1960) 'Recommendations adopted by the Pneumoconiosis Conference', Proceedings of the Pneumoconiosis Conference Johannesburg, 1959, pp 619-621 (Churchill, London).

FURTHER INFORMATION

This Guidance Note is produced by the Health and Safety Executive. Further advice on this or any other publications produced by the Executive is obtainable from Baynards House, 1 Chepstow Place, London W2 4TF, or from Area Offices of the HSE.

CONFIDENTIAL
 Subject to Protective Order in
 Ross v. Conoco, Inc., No. 80-4937
 14th Judicial District, Civil
 Division, Parish, Louisiana

APPENDIX: SAMPLING AND MEASUREMENT

1 The techniques in current use by the Health and Safety Executive for measuring time weighted average concentrations of "respirable" and "total" PVC dust in the breathing zones of persons at work are described below. In both cases, use is made of personal sampling equipment consisting of a filter holder, worn high on the person's chest (e.g. attached to lapel) within 30 cm of his nose-mouth region. The filter holder is connected to a battery operated portable pump which is attached to a belt worn around the waist and which is capable of running continuously for 8 hours.

Respirable dust sampling

2 The equipment used for respirable dust sampling consists of a cyclone type filter holder fitted with a pre-weighed glass fibre filter (either 25 mm or 37 mm diameter) and connected via a flow smoother to either a vane type pump or a diaphragm type pump. The design of the cyclone type holder and the sampling flow rate are such that only the respirable fraction of the dust, as defined by the Medical Research Council^{3,4}, reaches the filter.

Total dust sampling

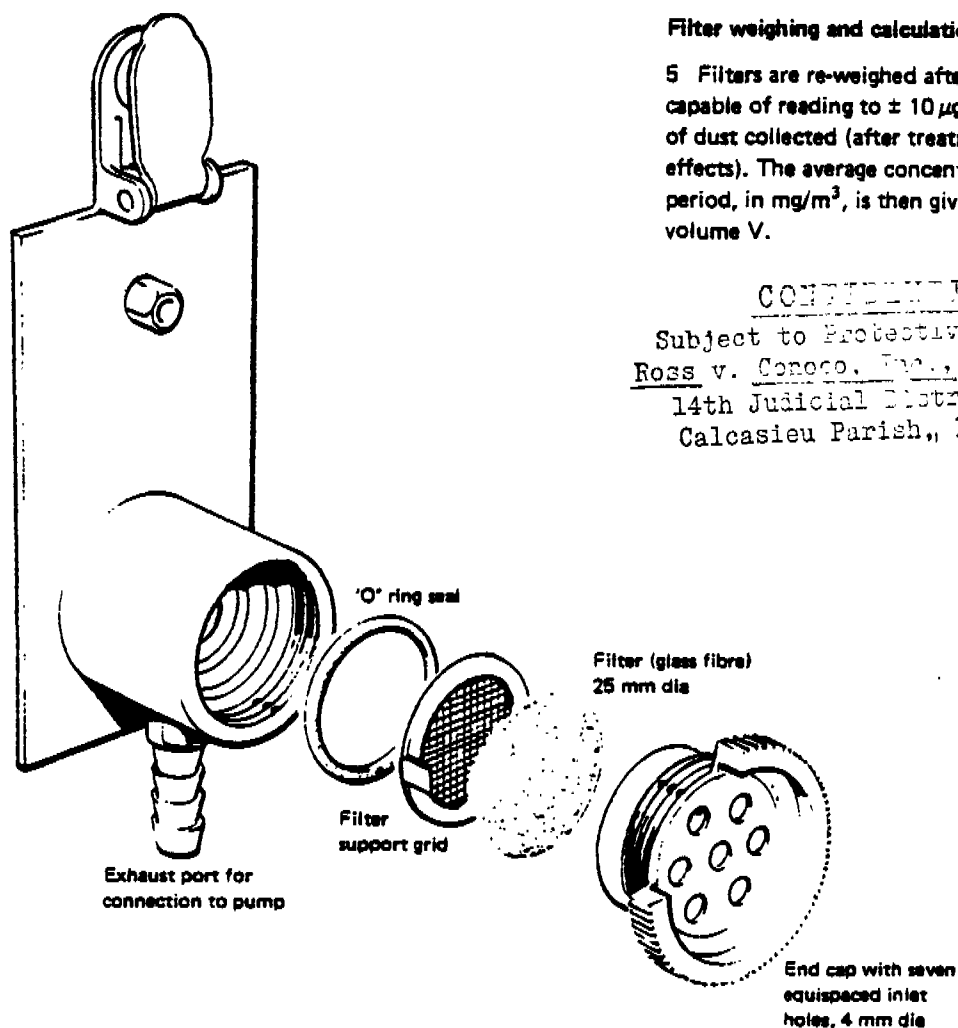
3 The equipment used for total dust sampling consists of a multi-orifice filter holder, as illustrated below, fitted with a pre-weighed, 25 mm diameter, glass fibre filter. The filter holder is connected via a flow smoother to a vane type or diaphragm type pump. The pump flow rate is maintained at 2.0 litres/min. The filter holder is attached to the wearer in such a way that the orientation of the filter is close to the vertical plane.

Air sample volume

4 For each sample obtained by the use of an unstabilised pump, the flow rate is checked, and adjusted if necessary, against an external flowmeter at the beginning and end of the sampling period and at 1 hourly intervals during sampling. The sample volume for each interval is calculated by multiplying the average of the flow rates at the beginning and end of the interval by the interval duration (in minutes). The total sample volume, V , (m^3) is then given by the sum of the volumes for these intervals. Where a stabilised-flow pump is used, the sample volume, V , is given by the flowrate (checked against an external flowmeter) multiplied by the sampling period.

Filter weighing and calculation of TWA concentrations

5 Filters are re-weighed after use on an electro balance capable of reading to $\pm 10 \mu g$ to obtain the weight, W , (mg) of dust collected (after treatment to allow for humidity effects). The average concentration of dust for the sampling period, in mg/m^3 , is then given by dividing weight W by volume V .



CONFIDENTIAL

Subject to Protective Order in
Ross v. Conoco, Inc., No. 90-4837
14th Judicial District Court
Calcasieu Parish, Louisiana

GUIDANCE NOTES

General Series

- GS 1 Fumigation using methyl bromide
- GS 2 Metrication of construction safety regulations
- GS 3 Fire risk in the storage and industrial use of cellular plastics
- GS 4 Safety in pressure testing
- GS 5 Entry into confined spaces
- GS 6 Avoidance of danger from overhead electrical lines
- GS 7 Accidents to children on construction sites
- GS 8 Articles and substances for use at work — guidance for designers, manufacturers, importers, suppliers, erectors and installers
- GS 9 Road transport in factories
- GS 10 Roofwork: prevention of falls
- GS 11 Whisky cask racking
- GS 12 Effluent storage on farms
- GS 13 Reporting of accidents to pupils and students

Chemical Safety Series

- CS 1 Industrial use of flammable gas detectors
- CS 2 The storage of highly flammable liquids
- CS 3 Storage and use of sodium chloride
- CS 4 The keeping of LPG in cylinders and similar containers
- CS 5 The storage of LPG at fixed installations
- CS 6 The storage and use of LPG on construction sites

Plant and Machinery Series

- PM 1 Guarding of portable pipe-threading machines
- PM 2 Guards for planing machines
- PM 3 Erection and dismantling of tower cranes
- PM 4 Safety at high temperature dyeing machines
- PM 5 Automatically controlled steam and hot water boilers
- PM 6 Dough dividers
- PM 7 Lifts
- PM 8 Passenger carrying paternosters
- PM 9 Access to tower cranes
- PM 10 Tripping devices for radial and heavy vertical drilling machines
- PM 13 Zinc embrittlement of austenitic stainless steel
- PM 14 Safety in the use of cartridge operated tools
- PM 15 Safety in the use of timber pallets
- PM 16 Eyebolts
- PM 17 Pneumatic nailing and stapling tools
- PM 18 Locomotive boilers
- PM 19 Use of lasers for display purposes
- PM 20 Cable-laid slings and grommets
- PM 21 Safety in the use of woodworking machines
- PM 22 Mounting of abrasive wheels
- PM 23 Photo-electric safety systems
- PM 24 Safety at rack and pinion hoists
- PM 25 Vehicle finishing units: fire and explosion hazards
- PM 26 Safety at lift landings
- PM 27 Construction hoists
- PM 28 Working platforms on fork lift trucks
- PM 29 Electrical hazards from steam/water pressure cleaners etc.

Medical Series

- MS 3 Skin tests in dermatitis and occupational chest disease
- MS 4 Organic dust surveys
- MS 5 Lung function
- MS 6 Chest x-rays in dust diseases
- MS 7 Colour vision
- MS 8 Isocyanates - medical surveillance
- MS 9 Byssinosis
- MS 10 Heat conditions and tenosynovitis
- MS 12 Mercury - medical surveillance
- MS 13 Asbestos
- MS 15 Welding
- MS 16 Training of offshore sick-bay attendants ('rig-medics')
- MS 17 Biological monitoring of workers exposed to organo-phosphorus pesticides
- MS 18 Health surveillance by routine procedures
- MS 19 The control of lead at work: medical surveillance
- MS 20 Pre-employment health screening

Environmental Hygiene Series

- EH 2 Chromium - health and safety precautions
- EH 4 Aniline - health and safety precautions
- EH 5 Trichloroethylene: health and safety precautions
- EH 6 Chromic acid concentrations in air
- EH 7 Petroleum based adhesives in building operations
- EH 8 Arsenic - health and safety precautions
- EH 9 Spraying of highly flammable liquids
- EH 10 Asbestos - hygiene standards and measurements of airborne dust concentrations
- EH 11 Arsine - health and safety precautions
- EH 12 Stibine - health and safety precautions
- EH 13 Beryllium - health and safety precautions
- EH 14 Level of training for technicians making noise surveys
- EH 15/80 Threshold limit values
- EH 16 Isocyanates: toxic hazards and precautions
- EH 17 Mercury - health and safety precautions
- EH 18 Toxic substances: a precautionary policy
- EH 19 Antimony - health and safety precautions
- EH 20 Phosphine - health and safety precautions
- EH 21 Carbon dust - health and safety precautions
- EH 22 Ventilation of buildings: fresh air requirements
- EH 23 Anthrax: health hazards
- EH 24 Dust accidents in maltheouses
- EH 25 Cotton dust sampling
- EH 26 Occupational skin diseases: health and safety precautions
- EH 27 Acrylonitrile: personal protective equipment
- EH 28 Control of lead: air sampling techniques and strategies
- EH 29 Control of lead: outside workers
- EH 30 Control of lead: pottery and related industries
- EH 31 Control of exposure to polyvinyl chloride dust

Subject to be filed in
Ross v. [illegible] No. 80-4367.
14th Judicial District Court
Calcasieu Parish, Louisiana

COPIED TO FILE
[illegible] 80-4367
[illegible]

CMA 0060