



General At-73
BFG activity *26-1(4)*

B. F. Goodrich Chemical Company

A DIVISION OF THE B. F. GOODRICH COMPANY

6100 OAK TREE BOULEVARD • CLEVELAND, OHIO 44131 • PHONE 216-524-0200

INTERNATIONAL DEPARTMENT

VIA AIR MAIL

January 10, 1975

~~R. B. KENNEDY~~
~~A. L. HASTINGS~~
~~L. M. PUCKETT~~ *A. L. Hastings*
~~C. R. FLYNN~~
CENTRAL FILES

1. Attached are newspaper articles relating to VCM emissions.
2. A report from the Development Center regarding "PVC Reactor Coatings for Preventative Buildup" is included. This summarizes some of the work in developing a suitable reactor coating to reduce the need for polymerizer entry.
3. Minutes of Plant Managers' meeting which summarizes some of the guidelines to be followed by U.S. B.F. Goodrich plants in meeting OSHA standards is also included.
4. Code Zero Task Force meeting minutes for the past several weeks which brings this part of the VCM transmissions up to date are attached.
5. Also attached is a letter from J.M. Whitney which recommends the Bendix Flasher units over the Head Space method for VCM analysis. Also a copy of the purchase order-requisition for the purchase of the units for the United States B.F. Goodrich PVC plants and a copy of the booklet put out by Bendix on the Flasher Unit can also be found in the attached transmittal.
6. A copy of an article carried by Barrons entitled "Explosive Controversy" is a good review of this overall VCM emission situation.
7. Also an article from a newspaper in Holland regarding the fact that medical examinations have revealed no physical problems with workers who are exposed to vinyl chloride is included.

Very truly yours,

John E. Stroope
John E. Stroope

JES/kan

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BFG33226

MSD work delayed

Goodrich finds vinyl chloride in sewer

By HOWARD FINNAN

Goodrich Chemical Co. has found low concentrations of vinyl chloride and another of the plastic-related chemicals in noxious fumes that have been delaying sewer work near the company's Bell's Lane plant.

Metropolitan Sewer District (MSD) executive director John J. Wilburn said yesterday that the fumes were discovered July 22. He said two employees of an MSD contractor became nauseated while opening a buried industrial sewer at Bell's Lane and 41st Street.

Both Wilburn and MSD engineer

Thomas J. McBride said they were certain the fumes that affected the workers were not methane "sewer gas" normally encountered in MSD repair work.

MSD attorney Robert W. Kenta said Goodrich "has been put on notice that it is violating MSD rules."

Wilburn said an MSD regulation prohibits users from employing a "noxious or malodorous gas" — or any substance that could chemically create such a gas — into a sewer.

According to Wilburn, the presence of what he described as "white clouds" of fumes in the 27-foot high sewer has been "persistent but recurring."

The large industrial sewer

fall sewer" empties into the Ohio River north of Schenck's Land in southwestern Jefferson County.

The Goodrich plant is located "downstream" from the MSD contractor's work site, but Wilburn said that opening the sewer had created "a chimney effect" that draws the gas back toward the work area.

Goodrich plant manager P.H. Lawrence said that the company has "done some analysis" of the fumes, finding "low concentrations" of vinyl chloride and acrylates.

Acrylates result from the manufacture of several heavily used industrial plastics, according to Eugene Plock, research

chemical engineer at the University of Louisville's Speed Scientific School. At least six former workers at the Bell's Lane plant are known to have died of a liver cancer traced to heavy vinyl chloride exposure in working places years ago.

The Environmental Protection Agency (EPA) is considering whether to add vinyl chloride to its list of regulated air pollutants.

Plock said the effects of acrylates are under investigation nationally and that he did not know if their presence in the

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Goodrich finds vinyl chloride in sewer

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fumes could have caused the nausea and other symptoms experienced by the workers. Goodrich said that the MSD contractor covered the presence of the fumes about the same time "the sewer workers found them."

Wilburn said the plant had had an accident and was not permitted to operate until it was cleaned up. He said the MSD contractor was not permitted to enter the plant until it was cleaned up.

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It is possible, Lawrence said, that at times the fumes noticed by the workers contain no substances from the Goodrich plant.

Exhaust fan being used

When the fumes were first discovered, Goodrich provided "gas masks" and other safety equipment for the workers.

Wilburn said the MSD contractor was not permitted to enter the plant until it was cleaned up. He said the MSD contractor was not permitted to enter the plant until it was cleaned up.

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The MSD board decided at its regular meeting yesterday to seek more information about the presence of the fumes and the exact length of work delays caused by them.

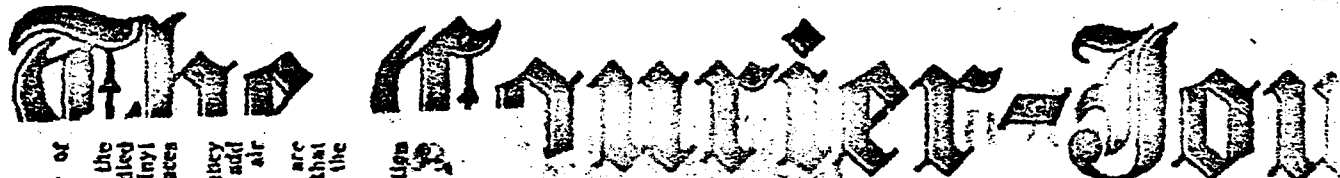
The contractor, Munich Engineering Corp. of Jeffersonville, Ind., has asked MSD for permission to stop work at the site until about June 1973.

MSD officials said the original completion date is February 1973.

The delay has been requested, Wilburn said, both because of the fumes and because of what is now expected to be late delivery of three "slated sales" to be used in existing normal sewage flow during high water on the Ohio River.

Wilburn said that under EPA and state orders MSD is installing the fumes on the sewer to prevent high water from backing up and disrupting the operation of the Southwestern Pumping Station.

Wilburn said that any delays to date had been solely because of the fumes.



LOUISVILLE, TUESDAY MORNING, OCTOBER 1, 1974

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September 26, 1974

Mr. Phillip H. Lawrence
Plant Manager
B. F. Goodrich Chemical Company
P. O. Box 954
Louisville, Kentucky 40201

Re: Morris Forman Wastewater Treatment
Plant Secondary Treatment and Sludge
Disposal Facilities, Sluice Gate
Chamber, Southwestern Pumping Station,
Contract No. 508-D

Dear Mr. Lawrence:

Please take notice that MSD is claiming damages against B. F. Goodrich Chemical Company as a result of B. F. Goodrich, its agents or assigns, allowing harmful fumes to enter the Southwestern Outfall Sewer causing interference with the contractual obligations between MSD and Munich Engineering Company in construction under the above subject project.

The presence of harmful fumes in the sewer which have been identified as vinyl chloride, butadiene, chloroform and other unidentified gases, was first noted by Munich Engineering Company on or about July 22, 1974, said gases being present virtually every day in varying amounts causing delay in construction. The presence of said fumes are in violation of MSD's Industrial Waste Surcharge and Industrial Waste Regulations. Under Section 4(E) of Appendix B "no person shall discharge, or cause to be discharged, to any public sewer, drain, stream or natural outlet under the control of MSD, any noxious or malodorous gas or substance, which either singly or by intersection with other wastes, is

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MSD

Mr. Phillip H. Lawrence
B. F. Goodrich Chemical Company
Louisville, Kentucky 40201
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capable of creating a public nuisance or hazard to life of or preventing entry into sewers for their maintenance and repair."

I understand that B. F. Goodrich has been placed on notice by MSD and Munich Engineering Company regarding this dangerous condition and, after your meeting with MSD representatives on July 25, 1974, that attempts have been made by B. F. Goodrich Company to remedy the situation. However, any attempts by B. F. Goodrich Company to reduce the presence of harmful fumes in the sewer have proven fruitless.

I would appreciate your informing me of any findings you may have regarding this matter and any proposal you may have for the immediate elimination of harmful fumes from the Southwestern Outfall Sewer. I suggest that you turn this matter over to your insurance carrier, inasmuch as MSD and Munich Engineering Company are intent upon having the party liable for interference with its construction contract compensate them for the loss in construction time and costs they have incurred.

If anyone from B. F. Goodrich Company or your insurance carrier would require any further assistance regarding this matter, please have them call me at (502) 587-0591 and I will be glad to provide them with

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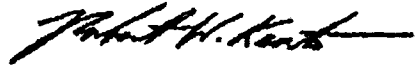
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MSD

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any additional information which is required. I also request, however, that anyone from B. F. Goodrich Chemical Company or your insurance carrier refrain from questioning any MSD employees in regard to this claim unless I am present.

Very truly yours,



Robert W. Keats
Legal Counsel

RWK/psg

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