



INTER-OFFICE CORRESPONDENCE

Date: April 15, 1976
From: Z. G. Bell, Jr.
Location: 10 West
Subject: VCM Video Script

To: F. Ludden

I have read the VCM video script and there are several errors in the content of the script and several items and camera procedures I feel are in need of revision.

1. The presentation is too long and I suggest it be divided into two parts. The first part should deal with the occupational health aspects and the second with the fire hazard.
2. While I believe that it is worthy to show some of the items made from PVC, too much time is devoted to this in the script. There is still some debate concerning the residue of VCM in certain PVC products. Saran Wrap is 85% VDCM and only 15% VCM (more vinylidene chloride than vinyl chloride).
3. Page 1, #2 - I think you are stretching the credibility that food wrap (meaning saran wrap) has done as much for public health as penicillin. This statement has to be deleted.
4. Page 2, #7 - There needs to be a section on the physical properties of VCM; that is, it is a gas, cannot be detected by odor below 1200 ppm, etc.
5. Page 3, #8 - The presentation implies that something happened around April 5, 1974. There were a lot of events that happened prior to April 1974. It leaves the impression that industry was sleeping, had no knowledge and did nothing until the government promulgated a temporary emergency standard. The MCA studies on animals were well in progress at that time.
6. Page 3, #9 - The changes in production to meet the standard is not medical surveillance. The standard included medical surveillance for workers potentially exposed to VCM. We had a medical program in Area B since the plant started operating. This was expanded. Again, we should not imply that the Government had to do everything for the industry. It is contrary to our position papers that we released when the VCM situation developed.
7. Page 3, #8-9 - I strongly object to the action and camera sequence. The impression and drama is to make cancer something mysterious. This sequence can be equated to a monster emerging from the swamp in the fog at night. This is unacceptable.

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8. Page 5, #10 - The wording used in the script mixes animal tests and the findings at B. F. Goodrich. While NIOSH may have informed OSHA of the B. F. Goodrich (BFG) situation, it was BFG that told NIOSH prior to January 22, 1974. Further, in July, 1973, NIOSH was informed by MCA of the animal test data from Maltoni's laboratory. NIOSH did nothing until BFG notified them of their two cases of angiosarcoma in their Louisville plant.

The American Industrial Hygiene Association never funded any animal research, it was the Manufacturing Chemists Association that contracted with Industrial Biotech Laboratory to do the animal studies. There is no question in any scientist's mind that VCM is capable of producing cancer in not only humans but in every animal strain thus far tested provided the concentration is high enough. This is a rare finding in the toxicology field.

I have written on Page 5 the suggested changes. I feel that some statement is needed concerning the latency period after exposure to develop cancer. It is omitted. As you recall the physical examinations change in frequency after ten years, after that time physicals are given every six months. Before that time, it is yearly. One might ask why?

9. The script is inconsistent in its use of VC and VCM. We should be consistent. Also, because women may be placed in the VCM area, we should not just use the masculine norms and pronouns in the presentation.
10. Page 10, #27 - The discussion of liver scans and biopsies need not be included. If we plan to keep the exposures within the standard, no employee should need either. We shouldn't scare them in this video tape presentation. The OCAW union does not endorse their workers to have liver biopsies at the request of the company doctor. Omit the last sentence.
11. Page 10, #29 - We have more than one regulated area - make last work (area) "areas".
12. Page 13, #40 - Any leaks seen by the employee "must" be reported immediately not "should" be.
13. Page 15, #48 - The first thing to remember in case of accidental spills is to not breathe vapors. While the liquid VCM is cold and could cause frostbite, it is not readily absorbed through the skin. A small spill in the laboratory can cause some extremely high concentrations to be breathed. I cannot over emphasize the importance not to breathe the vapors while decontaminating the clothes.
14. There are several other word changes suggested on Page 15 script.
15. Page 16, #54 - I do not understand the point being made in the last sentence.

16. Page 22, #80 - The formation of ice at a leak is a significant size leak and is considered a major leak. To look for ice is after the fact because exposure may have already occurred. See suggested changes.
17. Page 22, #81 and #82 - If you see a seal leaking, the first thing to do is not get exposed. Put on your respiratory protection and then put the spare pump into service.
18. Page 23, #85 - The equipment is not judged to be free of VC, it is tested and measurements recorded. The plant cannot just judge without measuring the VC levels.
19. Page 24, #88 - The work practice calls for the equipment to be blanked off as well as the other items specified. The OSHA standard requires that while workers are in the vessel, that the atmosphere be monitored continuously. There is nothing about monitoring during maintenance in the script at this point.
20. Page 25, #90 - This section implies that respiratory protection is not necessary or absolutely necessary. Suggest change in wording.
21. Page 26, #94 - Has NIOSH or MESA given approval for the type mask discussed? What is its approval number?
22. Page 28, #102 - I have not seen the test results mentioned in this paragraph. The only type canister masks that are to be used are those with NIOSH approvals for VCM. To select and show on video tape anything else can and will cause us problems. Further, by September, 1976, all canisters will have to have an end of service indicator. Unless we want to revise the video tape frequently, I would suggest some revisions in the script.
23. Page 28, #105 - The pocket respirator is for escape purposes only. It is not for work. The words "is to be worn by everyone" should read "carried by everyone". The point that this mask is for escape purposes should be stressed since I know the plants use these while working. This constitutes a violation of the OSHA standard. (page 29, #106, 107, 108, 109) It suggests that the escape mask is used to perform work. It cannot be.
24. Page 29, #111 - Change PPG to PPM.
25. Page 32, #117 - Change "should" to "will".
26. Page 32, #121 - Change "will be" to "are" and delete "built". By the time this tape is completed, the boxes should be ready. If they are not, delete this entire paragraph.

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27. Page 34, #129 - Add between "and" and "at" the words "any other operations".
28. Page 34, #133 - Can you ever see the vapor of VCM as per the beaker demonstration? In the eighth line I believe you mean you "cannot" sniff around, it says "can".
29. Page 35, #138 - Change "possible" to "potential".
30. Page 39 - In the personnel monitoring discussion towards the end, the forms should be shown and the notice to the employee of overexposures, where he signs, and what the supervisor must do to correct the situation. I think we should advise the employee, whose personnel monitoring shows an overexposure. We will have to determine what the worker was doing while the sample was being collected. There should be some scene and a discussion on how the charcoal tubes are analyzed as per the OSHA requirement. This has not been covered.
31. Page 39, #163 - The script states that VCM may be a causal agent in certain forms of cancer. This is a false statement. VCM can and has produced cancer. There is little doubt of the relationship and there is nothing causal about it. This method to lead into the fire hazard is unacceptable as written.
32. The basic warning about the fire hazard is appropriate, however, the video tape should state that the fire hazards will be covered in another presentation.

It is suggested that a group of people meet to decide on the exact wordings of the script. I feel very strongly about certain items in the script and have stated so.



Zeb G. Bell, Jr.

/clm

cc: J. A. Clapperton
F. C. Dehn
L. B. Grant, M.D.
B. Walker/J. M. Davis
R. E. Widing
R. E. Sourwine

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