

FOR REVIEW AND COMMENT OF
NOT FOR OFFICIAL RELEASE

MINUTES

Ad Hoc Subcommittee on Analysis of VCM Content - January 23, 1975
9:10 A.M.

Key Bridge Marriott, Arlington, Virginia

Attending:

Rodney P. Becker, Chairman, Diamond Shamrock Chemical Co.
Paul Bautista, Cincinnati Milacron, Cincinnati, Ohio
R. Carter, Johns-Manville, Denver, Colorado
R. S. Dalter, Cincinnati Milacron, Reading, Ohio
E. G. DeCapita, B.F. Goodrich Chemical Co., Avon Lake, Ohio
Dan Dixler, Keller and Heckman, Washington, D. C.
Sylvan Douglass, M & T Chemicals, Inc., Rahway, N. J.
Ray Durazo, Plastics Pipe Institute
R. R. Griffiths, Diamond Shamrock, Painesville, Ohio
H. J. Hall, Conoco, Ponca City, Oklahoma
Jerome Heckman, Keller and Heckman, Washington, D. C.
D. H. Hunter, M & T Chemicals, Inc., Rahway, N. J.
Arthur Karszes, DeBell and Richardson Testing Institute, Enfield, Conn.
Otto Kauder, Argus Chemical, Brooklyn, N. Y.
P. A. Ketterer, Tenneco Chemicals, Flemington, N. J.
Richard E. Laramy, Conoco, Ponca City, Oklahoma
D. A. Larson, Rohm and Haas, Bristol, Pennsylvania
A. Metzger, B. F. Goodrich Chemical Co., Avon Lake, Ohio
Stan Mruk, Plastics Pipe Institute
W. D. Nesbitt, Gifford-Hill, Dallas, Texas
W. W. Parker, Ethyl Corp., Baton Rouge, Louisiana
Randall S. Prust, Johns-Manville, Denver, Colorado
Cal Rehfus, Robintech, Painesville, Ohio
Axel W. Tybus, Ruco Div., Hooker Chemical Corp., Hicksville, New York
S. Werner, Ruco Div., Hooker Chemical Corp., Hicksville, New York
R. C. Wilging, B. F. Goodrich Chemical Co., Cleveland, Ohio

Mr. Rodney Becker, the Chairman, called the meeting to order following which he requested a self-introduction from each attendee.

The Chairman then asked Mr. Heckman to briefly touch on the question of which government agency has responsibility and authority in establishing regulations on VCM in PVC pipe or in the potable water which it conveys. Mr. Heckman stated that at the present time there

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is no clearly legally evident authority on this matter. The Food and Drug Administration claims control because water is food. The Environmental Protection Agency controls water quality at its source but it is not clear whether their jurisdiction can possibly extend into water in pipe-lines and in the home. Regional, state and local authorities might also claim control. Until the question of who has final control is clarified there is no basis on the part of the PPI, its members or anyone to act as if already conceding to the regulatory authority of FDA or any other agency. This, of course, is not to preclude the close following, and possible influencing, of the activities of these agencies in an effort to limit any possible finally authorized regulation to one which is based on facts and is most fair to all concerned.

Mr. Becker then reported that later that day a small group from the Subcommittee would meet with scientists from the FDA to discuss the Subcommittee's proposed referee procedure and the results of the round robin testing in which FDA participated. Included in the group would be Messrs. E. DeCapita, R. Griffith and Dr. D. S. Dixler.

The results of the round robin 'retests' performed according to the 'referee' procedure adopted at the last meeting were next discussed. The final reported test results were as follows:

<u>Laboratory</u>	<u>Sample 7137-52</u>	<u>Sample 7137-53</u>
1	2.7	33.0
	2.9	33.1
2	1.25	35.4
	0.5	35.4
3	2.2	38.8
	2.5	40.1
4	2.3	32.5
	2.0	33.0
5	2.2	38.4
	2.3	38.0
	2.5	37.3
	2.2	36.7
6	1.69	35.6
	1.81	38.0
7	3.0	39
	2.4	
8	No results reported	
9	8.6	34.5
	7.6	36.9
10	2.0	37.0
11	2.2	35.6
	4.0	37.1

The above table includes revised results submitted by Diamond and Conoco who found that through use of slower elution time they could get better accuracy. Of interest in the above are the results of laboratory No. 5 which is the F.D.A.

Since the procedure produced what was believed to be very good agreement, it was agreed that no further technical revision was necessary. It was decided, however, that a Scope and Outline of Method be added to the procedure. The final agreed-upon referee method is attached to these minutes.

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It was reported at this point by the representative from Johns-Manville that they are working with FDA on a program designed to measure the extractability of VCM. The first phase of this program was conducted using cut up samples of PVC immersed in water in a sealed bottle. The second phase calls for tests using water sealed inside sections of pipe. In measuring the concentration of VCM in water the FDA claims they can 'see' 0.1 ppb and are confident they could go down to 0.01 ppb.

In response to this report was expressed a general feeling shared by the Subcommittee members that 50 ppb is a much more practical, and reliable, limit of sensitivity and thusly is, as the FDA thinking has heretofore suggested, a practical definition of "zero". It was expressed and agreed that the Subcommittees' work should be based on this criterion and that at present there are really no solid technical grounds for promulgation or encouragement of adoption of lower concentrations as the criterion.

A discussion of the formulation of possible test programs which would categorize the extractability of VCM by water from PVC pipe led to the agreement that such work would best follow documentation of the availability of a reproducible and practical procedure that can measure VCM in water down to 50 ppb. In order to work to that end various possible procedures for measuring VCM in water were discussed. It was agreed that Conoco's procedure deserved an evaluation by the Subcommittee members. All participating

laboratories agreed to evaluate for VCM in water using samples to be prepared and provided by Conoco. It was estimated that by the end of February or early March results should be available for comparison.

In view of the above action it was decided to postpone discussion on development of testing programs using the Diamond prepared pipe until results of the above analytical tests are in by which time more definitive instructions may also be available from the VCM Committee. Since some members expressed a desire to do some preliminary evaluation on extractability it was decided to send each participating laboratory a small amount of the pipes. The remainder will be held by Diamond until needed.

The Subcommittee then agreed to forward the final referee method to the parent committee.

There being no further business the meeting was adjourned at 11:40 A.M.

Respectfully submitted,

SAM/cm

Stanley A. Mruk

M E M O R A N D U M

F 21-PAE
6-11-75 Pvc EPA

To: Mr. Jerome Heckman
Keller and Heckman
1150 17th. Street, N.W. Suite 1000
Washington, D. C. 20036

From: Stanley A. Mruk

Subject: Minutes of Subcommittee on Analysis of VCM Content

Enclosed please find minutes of the January 23, 1975 meeting
for your review.

Thank you.

SAM/cm
Enc.

Stanley A. Mruk

c.c. R. Durazo
R. Becker

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