



# THE DOW CHEMICAL COMPANY

BENNETT BUILDING  
2030 DOW CENTER  
MIDLAND, MICHIGAN 48640

## REPORT OF HEALTH SUB-COMMITTEE

### PVC SAFETY COMMITTEE

#### SOCIETY OF THE PLASTICS INDUSTRY, INC.

MARCH 31, 1978

The Health Subcommittee has dealt with the following matters during 1978.

1. The Subcommittee met January 11, 1978 in the office of Beveridge, Fairbanks and Diamond to assist in preparing comments regarding the proposed amendments to the EPA National Emission Standard for Vinyl Chloride. The comments were submitted March 9, 1978. The minutes of this January 11 meeting have been distributed.
2. Continued its efforts to establish a vinyl chloride literature information service. The subcommittee has so far been unsuccessful in finding a group capable of collecting compiling, abstracting, interpreting and distributing published and unpublished proposals, protocols, interim reports, final reports and publications relative to vinyl chloride. Preliminary discussions are currently underway with the Oak Ridge National Library to determine their ability to provide the needed services.
3. Provided an informal communications channel for medical and toxicological data. For example, the final Equitable Environmental Health Report (January 1978) supported through the MCA was included in the Beveridge, Fairbanks and Diamond submission. We are corresponding with European producers as well as with U. S. laboratories studying VCM and related compounds.

Respectfully submitted,

T. R. Torkelson  
Subcommittee Chairman

cc: Subcommittee Members

mh



GENC 010202

ATTENDEES:

D. C. Nuechterlein -CHAIRMAN - Dow Chemical Co. 2020 Dow Center, Midland, MI 48640  
R. J. Abramowitz - Hooker Chemicals, River Road, Burlington, NJ 08016  
A. Ross Adams - Air Products & Chemicals, P. O. Box 538, Allentown, Pa 18105  
Richard Ayen - Stauffer Chemical Co., Dobbs Ferry, New York 10522  
Gary H. Baise - Beveridge, Fairbanks & Diamond, One Farragut Sq. S. Washington, D.C.  
John T. Barr - Air Products & Chemicals, P. O. Box 538, Allentown, Pa 18105  
W. Bailey Barton - Borden Inc., 180 East Broad St. Columbus, Ohio 43215  
Scott W. Bowen - Beveridge, Fairbanks & Diamond, One Farragut Square S. Washington, D.C.  
Phillip D. Cunningham - Stauffer Chemical Co., Westport, Ct 06880  
Fred C. Dehn - PPG Industries, 2630 Quail Hill Drive, Pittsburgh, Pa 15222  
R. B. Downey - B. F. Goodrich Chemical Co., 6100 Oak Tree Blvd. Cleveland, Ohio 44151  
- J. E. Ertel - The Pantasote Co. of N.U. 26 Jefferson Street, Passaic, NJ 07055  
H. R. Flammer - Continental Oil Co., Park 80 Plaza East, Houston, TX 77001  
John C. Floros - Great American Chemical Co., 650 Water St. Fitchburg, Mass 01420  
Gary Ford - Stauffer Chemical Company, Westport, Ct. 06880  
Roy T. Gottesman - Tenneco Chemicals, Inc. Park 80 Plaza West One, Saddle Brook, NJ 07662  
R. L. Harding, Jr. - SPI, 355 Lexington Avenue, New York, New York 10017  
C. L. Harrington - Shintech Inc., 3800 Buffalo Speedway, Houston, Texas 77098  
Jerome H. Heckman - Keller & Heckman, 1150 17th Street, Washington, D.C. 20036  
Jerry M. Janes - Ethyl Corporation, Ethyl Tower, Baton Rouge, La 70801  
Maurice N. Johnson - B. F. Goodrich Chemical Co., 500 So. Main, Akron, Ohio 44318  
D. L. Kent - B. F. Goodrich Chemical Div. 6100 Oak Tree Blvd. Cleveland, Ohio 44131  
D. A. Kuhn - Conoco, P. O. Box 2197, Houston, TX 77001  
John R. Lawrence - SPI, 355 Lexington Avenue, New York, New York 10017  
J. K. Presswood - Ethyl Corporation, P. O. Box 341, Baton Rouge, La 70821  
William Rupp - Tenneco Chemicals, P. O. Box 365, Piscataway, NJ 08854  
R. D. Savage - B. F. Goodrich Chemical Div. 6100 Oak Tree Blvd. Cleveland, Ohio 44131  
J. M. Smerglia - Goodyear Tire & Rubber Co., 1144 E. Market St., Akron, Ohio 44316  
D. K. Spencer - Shell Chemical Co., One Shell Plaza, Houston, TX 77001  
M. M. Swetonic - Hill & Knowlton, Inc. 633 Third Avenue, New York, NY 10017  
T. R. Torkelson - Dow Chemical Co., 2030 Dow Center, Midland, MI 48640  
Todd C. Walker - Firestone Plastics Co., P. O. Box 699, Pottstown, Pa 19464  
R. N. Wheeler - Union Carbide Corp., P. O. Box 8004, S. Charleston, WVA 25343  
Jim Worthington - Diamond Shamrock Corp., 1100 Superior Avenue, Cleveland, Ohio 44114

\*\*\*\*

- 1 - Mr. Nuechterlein opened the meeting with a general review of the working (relationship developed with the American Industrial Health Council (AIHC) at the meeting with AIHC's Steering Committee in February.

Mr. Baise summarized the preparation for and presentation made at the EPA March 23 meeting to review its existing cancer policy and receive comment on the EDF petition to revise this policy. He indicated that one of the key points made in the SPI presentation was to set the record straight with respect to erroneous EDF claims.

GENC 010203

He indicated that EPA did show some recognition of cost consideration and a concern about how carcinogen regulation can be expedited.

Mr. Barr also commented on his participation at the EPA meeting. He observed that EPA appears to have a sincere concern about the economic impact and speed of developing further carcinogen regulations.

#### Where Do We Go

EPA requested some response on the following:

- . Interim cancer policy - what effect does it have now?
- . Legal issue - does Section 112 call for zero emission (due process and authority)
- . Dual regulation under Sections III and II2

#### Vinyl Chloride Amendment

Mr. Baise made the following comments:

- (a) EPA's particular interest in the role of AIHC's alternatives is speeding up EPA's regulation of carcinogens.
- (b) EPA's attitude that there has to be a specific lower limit established for each carcinogen below such regulation will not apply.
- (c) EDF - tied up with other activities and will not commit to timing on what action it will take .
- (d) EDF - wants zero goal.
- (e) It is unlikely that court action could be used to precipitate amendments..
- (f) The Dames and Moore worst case study represents the first time this kind of work has been done on a material like vinyl chloride.
- (g) The Enforcement memorandum will be out about April 15.

Mr. Baise indicated that the Supreme Court decision on the Adams case raises a question as to the enforceability of a work practice standard issued under Section 112. It may be that legislative action will be required to fully correct this situation. The SPI Washington office will follow activities in this area. Mr. Nuechterlein suggested that Mr. Baise prepare recommendations for future action with EPA. These recommendations should be passed along to the AIHC Steering Committee through Mr. Keith McKennon.

EPA will probably move for enforcement of the existing vinyl chloride regulation in October 1978 with some uncertainty as to their authority to enforce it. In the meantime, it is believed that EPA will probably do nothing unless EDF forces the issue.

2 - FDA Activities

Mr. Heckman reviewed the status of FDA's Proposed PVC Packaging Rule published in September 1975. He reported that FDA has withheld action on this rule because of the ban on the use of AN polymer for beverage containers. Monomer levels in PVC have been reduced to such a low level as to be "undetectable" as a migrant. However, the diffusion theory applied in the AN case is now subject to reconsideration.

To overcome the dilemma created by the AN decision, FDA is now working to develop data. Mr. Heckman referred to his report of February 28 listing the data FDA would like to have.

He further reported on the formation of an ad hoc committee (SPI Inter Operating Unit Plastics Packaging Risk Assessment Committee) to develop the necessary material. SPI Committees to be involved include:

- Food, Drug & Cosmetic Materials Committee
- PVC Safety Group
- AN Polymer Producers
- Polystyrene Safety Group
- Plastics Beverage Container Committee
- Plastics Container Strategy Group
- Toxicity Committee
- Plastics Bottle Institute

Mr. Nuechterlein indicated he would make assignments to the committee from the PVC Safety Group.

On October 31, 1977 FDA assigned EPA responsibility for plastic pipe.

3 - Nominating Committee Report

Dr. Ross Adams reported that the Nominating Committee proposed that Dow, Diamond Shamrock and Firestone be elected to the Steering Committee for an additional three year term starting June 1, 1978 and that Messrs. Nuechterlein, Schaefer and Walker, of these companies, be elected to the offices of Chairman, Vice Chairman and Treasurer respectively. It was moved and unanimously accepted that this proposal be adopted.

4 - Health Committee

Dr. Torkelson presented a report on the activity of the Health Committee (copy attached).

- 5 - Mr. Kent identified the concerns of the PVC Fire Safety Committee as being the Combustion Products Toxicity Testing underway at the National Bureau of Standards, and said it is the intention of the Coordinating Committee on Consumer Safety to follow this very closely. He also reported on their continuing concerns with respect to properly representing polyvinyl chloride involvement in fires. He made specific reference to an article in a recent issue of RN magazine on the health hazards of PVC and other plastics involved in fires.

It was agreed that an ad hoc committee be formed to develop appropriate response from a broad plastics industry concern rather than just PVC. This problem will be brought to the attention of the PAC's PR Committee at its meeting on April 3 for action. If appropriate response is not developed by the PAC, then the PVC Fire Safety Committee will follow through.

6 - Communications Committee

Mr. Downey reported on a review of public relations activities that developed a three-tier budget at levels of:

A. \$16,500 per month

|                       |                         |
|-----------------------|-------------------------|
| <u>Optimum Budget</u> | - Full range of service |
|                       | Top level briefing      |
|                       | Radio/TV training       |
|                       | Quick PR response       |

B. \$11,000 per month

|               |                           |
|---------------|---------------------------|
| <u>Actual</u> | - Good program            |
|               | Normal emergencies        |
|               | Updating of backgrounders |

C. \$6,000 per month

|                |                                     |
|----------------|-------------------------------------|
| <u>Minimum</u> | - Bulk on Washington communications |
|                | Media contact and response          |
|                | Inter industry affairs              |
|                | Update of basic papers              |

It was recommended that these activities continue at level B through December 1978.

7 - Financial Report

Mr. Walker referred to the March 17 letter from Firestone Plastic Company's Controller which estimates funds available to the PVC Safety Group at the end of the current SPI fiscal year at \$117,620. He speculated that these funds may be sufficient to take the Group through the first six months of next year if no unusual activities occur. It was requested that a capacity analysis be conducted before the next assessment is made to the committee.

It was agreed that an accounting of expenses for the March 23 EPA meeting be sent to AIHC. It was indicated that it is expected AIHC will pick up EPA concerns in the future.

- 8 - It was agreed that a tentative meeting of the Steering Committee be scheduled for June and the full committee would meet in September unless there is a need for any emergency meetings.
- 9 - The meeting adjourned at 2:15 p.m.

Respectfully submitted,



John R. Lawrence  
Technical Director

Attachments  
4/7/78

GENC 010207