September 23, 1974

POSSIBLE QUESTIONS & ANSWERS
RALPH L. HARDING INTERVIEW
CBS-TV SPECIAL ON VINYL CHLORIDE

1. The Federal Environmental Protection Agency announced last week that it is planning to establish regulations that would cut VCM emissions to the atmosphere by from 75-90 percent. The EPA estimated that the regulations would add four percent, or one cent a pound, to the price of PVC resin. What is the industry's position on these proposed regulations?

Answer: The following points should be made in any response to the above or a similar question.

a. The industry is working hard right now to control VCM emissions to the atmosphere. We believe these efforts over the years have been highly successful.

b. An earlier report from the EPA stated that current levels of VCM in the air surrounding VCM and PVC manufacturing plants are not hazardous to health. We certainly believe that this is true.

c. We do not know at this time whether the EPA goal of 75-90 percent reduction in emissions is technically feasible. You must remember that we are talking about a sizeable reduction of what is already a very small amount being released from the plants. The lower you go in reducing emissions, the tougher it becomes.

d. There is little doubt that meeting the EPA goals will raise the costs of PVC resin. Whether the EPA estimates are accurate or not is something we cannot judge at this point, because we do not know, assuming the goals are technically feasible, how much they will cost.

e. The PVC industry is, of course, totally committed to protecting the health of people living in the vicinity of its plants. We believe the air outside our plants is safe today and we intend to make sure that it remains safe in the future.

2. How can you claim that current VCM emissions are safe when it has been shown that a number of people living in the vicinity of PVC plants have already died from angiosarcoma of the liver?

Answer: At the OSHA hearings in June, the Dow Chemical Company reported on a study it conducted of nearly 600 long term vinyl chloride workers. The study showed no excess mortality and no angiosarcomas in workers exposed to VCM at levels below 200 parts per million. Certainly these workers had exposures far greater than any to which people living in the vicinity of PVC plants could be subjected. For this reason, we must be very careful in jumping to conclusions on these alleged "neighborhood" cases. As you are well aware, angiosarcoma of the liver can result from a number of causes. Vinyl chloride is only one of them. We need a lot more information before we can arrive at a definite conclusion on these cases one way or the other.

3. Occupational exposures in PVC fabricating plants are admittedly far less than in monomer or polymer plants, yet angiosarcomas have also been found in the PVC fabricating industry. How can you maintain, therefore, that it is not necessary to go to a "no detectable level" to protect workmen?

Answer: Same as for #2 above.

4. A recent study conducted in Ohio showed a greater than normal incidence of birth defects among children living in communities containing PVC plants. How can you explain this?

Answer: This is once again a matter of jumping to conclusions on the basis of very scanty information. The doctor who conducted the study stated quite clearly that his findings were based on "crude data" and that he was not "saying or implying that this (problem) is related to polyvinyl production. It just happens that there are plants in those areas. There could be hundreds of factors." He didn't even know whether the parents of the children with defects worked in any of the plants or even where they lived in relation to the installations. We don't even know what kind of birth defects are involved. While the questions raised certainly deserve investigation, there is absolutely no reason for people to panic.

5. What about Dr. Selikoff's findings of chromosome changes in vinyl chloride workers?

Answer: Dr. Selikoff would himself be the first to admit that the information available to date is quite scanty. After all, only 11 men were involved in the chromosome investigation. Nonetheless, we believe that all avenues should be thoroughly researched. Hopefully, this can be done in a completely scientific fashion, and that people's fears will not be aroused unnecessarily or prematurely.

6. The Consumer Product Safety Commission recently banned the use of VCM as a propellant in aerosol sprays. Do you agree with this decision?

Answer: We believe that prudence should be exercised in all situations where there is potential human exposure to quantities of VCM. In some situations, such as the use of VCM in aerosols, the exposure is unnecessary and prudence would dictate that it be stopped.

7. The FDA is currently working on regulations aimed at minimizing the migration of uncombined VCM from PVC food packaging products into food and beverages. Does this mean that there is a hazard from ingesting the tiny amounts of VCM that could be found in these products?

Answer: Certainly not. There is no evidence whatsoever that the ingestion of VCM is a health hazard. The FDA began working on these regulations long before the angiosarcoma problem was discovered. The Society of the Plastics Industry has worked long and hard with the FDA on developing these regulations. The primary problem that the FDA was concerned with was that of taste. Too much uncombined VCM in a beverage, for example, can affect its taste. Health was not the problem.

8. What will happen if OSHA adopts a "no detectable level" standard?

Answer: I think the industry has made its position on that quite clear. It would be forced to close down because it is technically infeasible to achieve such a level and it would be unsafe to have workmen spend eight hours a day in airline respirators.

9. If OSHA adopts a standard higher than zero but lower than that recommended by SPI in its presentation, what would happen? Would the industry shut down? Would it take the matter to court?

Answer: I cannot speak for any individual company so any answer I would give to that question would be premature and inappropriate. The industry and individual companies within the industry will have to evaluate whatever standard is promulgated on the basis of their own operations. If the standard is too low, I would suspect that some smaller companies might decide to shut down. As far as legal action is concerned, we must await the standard before coming to any decision.

10. You have already stated that you believe current plant emissions of VCM are not hazardous. Does this mean that the industry will oppose the planned EPA standards, which have as a goal the further reduction of plant emissions?

Answer: We are totally in favor of reducing emissions of VCM to the atmosphere to as low a level as is technically feasible. Right now, we have no idea how low we

can go. It is my understanding that studies are being undertaken within the industry to determine the feasibility of further reductions in ambient emissions. Only when these are completed and analyzed will we be able to judge the appropriateness of the EPA goals.

11. PVC is used in thousands of products with which people come in daily contact. The industry has admitted that there is some uncombined VCM in all PVC resin which it produces. Doesn't this mean that we are all at some risk from using PVC products?

Answer: Not at all. There is no evidence whatsoever that there is any general public hazard from the use of finished PVC products. What small amounts of uncombined monomer exist in resins are further reduced in the fabricating process so that finished products contain essentially zero uncombined VCM. In addition, the industry is working diligently to even further reduce the amount of residual monomer in the resins which it produces.

12. Large quantities of VCM have been found in water supplies around PVC plants. Isn't this a hazard?

Answer: No, it isn't. EPA head Russell Train recently said that there is absolutely no evidence that vinyl chloride in water is even potentially hazardous. Nonetheless, the industry, as part of its overall program, is striving to reduce emissions into water supplies as well as into the air.

###