

Air Products

cc: *Ray Schenck*
cc: *Ray Schenck*

Date 28 October 1977

INTEROFFICE
MEMORANDUM

RECEIVED

NOV 04 1977

LAW DEPT.

Subject Regulation of Generic Carcinogens

To L. C. Holt, Jr.

Executive

(Location, Organization, or Department)

From J. E. McEvoy

Government Relations

(Location, Organization, or Department)

cc: E. Donley
R. Fleming
W. Kendrick/D. Keehn

I received the attached "Information Copy" relating to regulation of generic carcinogens which was sent to MCA Executive Contacts. I believe it is important for Air Products to formulate a position on the proposed regulations, and a decision made on whether or not to actively support this position in Washington either in concert with MCA, the "ad-hoc" group headed by Paul Orefice, or independently.

The Government Relations Department should be made aware of internal decisions on this matter so we may effectively promote our policy provided, of course, that we do wish to do something.

I understand that the "ad-hoc" industry task force has requested \$25,000 contributions from 30 chemical companies to study, promote and "lobby" their position. Unfortunately, subscription to such an effort probably implies endorsement of the final position, and subsequent lobbying activity which could be contrary to Air Products' interests. Personally, I do not favor such an involvement unless we have strong representation and participation in the committee work, as well as a sense that our policy and objectives coincide reasonably well with the group interests.

Through discussions I have had with Dave Keehn and Ray Schenck, I understand that Dick Fleming is one of the Senior Advisors on health and safety which are referred to in Driver's letter. This is helpful. I also note that MCA will be forming an inter-committee task group to prepare a response to the OSHA proposal which will coordinate with the industry ad hoc group. We should have representation on this task force (Ray Schenck and/or Mayo Smith/Lloyd Tepper?).

It is important to note the OSHA calendar of December 8 for initial comments and January 9 for more detailed comment. We will have to move fairly rapidly. Fortunately Ray and Dave have been aware of this since early April so are not unfamiliar with the proposed regulations. I understand that Ray has completed a legal analysis of the proposals.

Again, I would appreciate being informed of any internal action or decisions on this subject.

JEM:rmc
Attachment

Jim
J. E. McEvoy

(320)

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