

VCM AND PVC PRODUCERS GROUP
STEERING COMMITTEE

SPI Conference Room
New York, New York

Tuesday, September 28, 1976
10:30 A.M.

Attendees:

Dr. A. Ross Adams, Air Products & Chemicals, Allentown, Pa. 18105
Lynn W. Babcock, Diamond Shamrock Corp., 1100 Superior Avenue, Cleveland, Ohio
Gary H. Baise, Beveridge, Fairbanks & Diamond, One Farragut Sq. Wash. D.C. 20006
Robert S. Brookman, Firestone Plastics Co. Box 699, Pottstown, Pa. 19464
G. E. Disch, Tenneco Chemicals, Inc. Box 365, Piscataway, N. J. 08664
Daniel S. Dixler, Keller & Heckman, 1150 17th St. Washington, D. C. 20036
R. B. Downey, B. F. Goodrich Chemical Co. 1600 Oak Tree Blvd. Cleveland, Ohio
Robert L. Ferrante, Hill & Knowlton, 633 Third Avenue, New York City 10017
Ralph L. Harding, Jr. SPI, 355 Lexington Avenue, New York City 10017
Jerome H. Heckman, Keller & Heckman, 1150 17th Street, Washington, D.C. 20036
Harold Himmelman, Beveridge, Fairbanks & Diamond, One Farragut Sq. Wash. D. C.
Karl A. Hochschwender, American Hoechst Corp. Route 202-206 North,
Somerville, N. J. 08876
Bob Laundrie, General Tire & Rubber Co., One General St. Akron, Ohio 44329
John R. Lawrence, SPI, 355 Lexington Avenue, New York City 10017
D. C. Nuechterlein, Dow Chemical, 2020 Dow Center, Midland, Michigan 48640
Dick Savage, B. F. Goodrich Chemical Co., 6100 Oak Tree Blvd. Cleveland, Ohio
Matt Swetonic, Hill & Knowlton, 633 Third Avenue, New York City 10017
J. E. Zimmerman, Diamond Shamrock, 100 Superior Avenue, Cleveland, Ohio 44114

ACTION SUMMARY

1. Steering Committee recommends Group's activities be continued with affirmation to be obtained from full membership.
2. Dr. Maltoni's latest interim report reviewed; action taken to forward it to U.S. government agencies.
3. Proposed that Group advise CEFIC of interest in cooperating with human dose response studies; U. S. protocol to be developed.
4. Task force appointed to study what should be done to develop industry position on PVC's involvement in fires.
5. Recommended that "Action Program" be continued.
6. Tentative date for full Producers Group meeting set for November 30, 1976.

1. Chairman Ross Adams opened the meeting with self introductions and called attention to the agenda listing the items to be covered in the day's meeting.
2. Attention was called to audit of the Group's expenditures for the fiscal year ending May 31, 1976 (copy attached). Dr. Adams noted that the expenditures broke down into the following major categories:

Legal	-	\$308,472.49	-	55.92%
Public Relations	-	227,794.19	-	41.30
Meeting Expenses	-	10,543.69	-	1.91
Office Supplies & Expenses	-	4,076.91	-	.74
Telephone & Telegraph	-	698.38	-	.13
TOTAL	-	<u>\$551,585.66</u>	-	<u>100.00%</u>

Mr. Lawrence reported that the open assessments as of May 31 have all been paid or accounted for. The Group's funds balance as of SPI's August 31, 1976 statement was \$15,934.

NOTE: Although the breakdown of income and expenditures since May 31 were not reported at the meeting, a subsequent review shows them to be as follows:

INCOME

Balance as of May 31, 1976	\$40,430.37
Income - Assessments	35,100.00
Literature Sales	93.60
	<u>\$75,623.97</u>

EXPENDITURES

Legal	\$19,893.90
Public Relations	36,488.33
Meeting Expenses	- 0 -
Office Supplies & Expenses	3.20
Telephone & Telegraph	4.00
	<u>\$59,689.43</u>
TOTAL	- <u>\$59,689.43</u>

Balance as of August 31, 1976 \$15,934.54

3. Dr. Adams initiated a general discussion on the future status of the Group's activities and posed questions relating to the scope of future activity; organizational apparatus and mandate from the full committee. He proposed that a letter be sent to member companies to get their thinking on these questions and that a full meeting be held to provide future direction.

The immediate future activities with government agencies with which the Group has been active in the past were summarized as follows:

OSHA - No major activities can be anticipated except those relating to enforcement regulations. Mention was made of the question of industry action to obtain a waiver on the requirement for indicating respirators. (see below).

EPA - It is expected that the EPA regulation will be issued in a matter of days. Bob Landrie reported that his EPA Technical Committee will be meeting with EPA enforcement staff to answer questions relating to the establishment of field enforcement procedures.

It is anticipated that limited assistance will continue to be provided by the Group's special EPA counsel, Beveridge, Fairbanks & Diamond. Direct contacts with the firm by members should be avoided. It will be preferable to contact SPI staff (John Lawrence) or Keller & Heckman staff (Joe Hadley) unless this special counsel is being retained directly by a group member company.

FDA - Mr. Heckman reported that he is still uncertain as to when and what kind of action FDA will take on its proposed Rule. However, some disturbing statements coming from FDA indicate they may permit the continued use of rigid and semi-rigid PVC packaging only with extremely low vinyl chloride in the container wall. Mr. Heckman has been keeping the industry informed on FDA's activities through his regular reports. (Latest report No. 27 issued September 23).

Attached to these Minutes is a summary report supplied by Mr. Heckman on the status of VCM with all of the above agencies.

The Steering Committee was in agreement that the activities of the VCM and PVC Producers Group should be continued to cover all of these Federal activities but, as previously mentioned, Dr. Adams should write to the full VCM and PVC Producers Group asking for a mandate to continue the Group's activities.

SPI-08306

4. Health issues involving vinyl chloride were reviewed as follows:

- (a) Dr. Maltoni's interim report to CEFIC received in the SPI office on September 24 was reviewed together with the statement on this report prepared by the CEFIC Main Committee at its meeting on September 27. Mr. Neuchterlein indicated that there were a number of questions raised about this report by Dow's technical people and suggested that it would be important to try to arrange for a direct meeting with Dr. Maltoni to review a number of details related to his research. These questions and the possibility of setting up a meeting with Dr. Maltoni are to be passed back to CEFIC by Karl Hochschwender.

NOTE: Karl Hochschwender passed these questions along to his CEFIC contact and was advised that it would not be possible for American representatives to meet with Dr. Maltoni to review his research at this time. However, the European sponsors of Dr. Maltoni's studies have many of the same questions as those raised by Dow and they will review these points with Dr. Maltoni at an appropriate time.

After further discussion it was agreed that copies of the latest report on Dr. Maltoni's work should be forwarded to representatives in government agencies that have been directly involved with the toxic hazards of vinyl chloride.

Subsequently, a letter forwarding the Maltoni Report and the CEFIC Statement over Ralph L. Harding's signature was sent to representatives in EPA, NIH and FDA as indicated (copy attached).

- (b) Dr. Adams reviewed the plan that is developing within CEFIC to prepare a dose response curve for humans exposed to vinyl chloride and suggested that the U.S. PVC industry offer to cooperate with the European program. It was agreed that Dr. Adams would advise his CEFIC contacts of our interest in cooperating with this program.

After additional discussion, it was moved that steps be taken to investigate the feasibility of developing a protocol for understanding retrospective human dosage of vinyl chloride.

5. Mr. Richard Savage presented a detailed review of the issues relating to the burning of PVC. An outline of his comments are attached to these Minutes. He emphasized the importance of developing specific industry positions on the significance of PVC's involvement in fires. After considerable discussion, it was agreed that an invitation should be sent to PVC producers to appoint appropriate technical representatives to meet, discuss and explore what might be done. Mr. Dan Kent of B. F. Goodrich was nominated to chair this task group.
6. Dr. Karl Hochschwender reviewed his activities directed toward establishing better liaison with European developments on VCM and PVC issues. He is maintaining contact and attending CEFIC meetings where he is attempting to keep them informed on U.S. Standards and Regulations as well as keeping abreast of European activities. Evidence of his success in these endeavors are reflected elsewhere in these Minutes.
7. Mr. Heckman reviewed the status of the question of the use of PVC for potable water and referred to the memo of understanding that has been developed between EPA and FDA. This states that EPA is responsible for all aspects of potable water under the Safe Drinking Water Act, and that FDA will not become involved unless it finds special problems developing. It is not expected the FDA's PVC Rulemaking will cover drinking water.

It was pointed out that the non-availability of respirators with "end of life" indicators may put some industry plants in violation of OSHA regulations. OSHA has refused to act on this matter unless the situation is brought to them as an industry problem. Mr. Heckman is not in a position to act on this from an industry standpoint unless he can be supplied more information on the situation by several member companies.

Mr. Heckman said he would act on behalf of the industry on the question of continued use of half face respirators if he was supplied with information that would support such a position.

8. Mr. Baise reported that when the EPA VCM Standard is issued that waivers should be requested within 45 days. After 90 days non-compliance can result in an order to close down immediately. (Further clarification is available in H. Himmelman's letter of September 30, 1976 to E. Recih).
9. Mr. Downey reported on the progress of the Communications Committee's "Action Program" on behalf of its Chairman, Mr. Ed Ackerman who could not attend this meeting. A copy of report he reviewed is attached to these Minutes. It was recommended that the program be continued on a conservative basis on a budget of \$18,000 a month for the next three months.
10. In estimating expenditures that might be incurred in the immediate future, the following budget was developed for the period September through November:

	<u>Per Month</u>	<u>Sept - Nov.</u>
Legal	\$15,000	\$ 45,000
Public Relations	18,000	54,000
Meeting Expenses	800	2,400
Office Supplies, Etc.	400	1,200
	<u>\$34,200</u>	<u>\$102,600</u>

The Committee agreed to recommend a budget of \$100,000 to the full VCM and PVC Producers Group for the period through November 1976.

11. The tentative date of November 30, 1976 was selected for the next meeting of the Steering Committee as well as the full VCM and PVC Producers Group.

The meeting adjourned at 3:00 P.M.

Respectfully submitted,


John R. Lawrence
Technical Director

Attachments