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JUL 27 1976

To: W. A. Mazzolini
K. E. Ross

M. E. EISENHOUR

Date: July 8, 1976

Copy: A. S. Amatangelo
M. E. Eisenhour
F. S. Provenzano

Subject: Meeting with
Dr. Charles R. Perry,
Associate Professor,
University of Pennsylvania

A meeting was held July 7 to discuss the costs of compliance with the OSHA VCM standard. In attendance were ME Eisenhour, RL Frantz, LJ Kunke, JB Leverton, CR Perry, FS Provenzano, GF Tacquard.

ME Eisenhour presented a handout on US PVC production capacity. A brief overview and discussion of the industry followed. Extent and diversity of PVC uses was stressed.

Also presented was a handout of UCC costs to comply with the VCM standard. FS Provenzano mentioned that the cost per pound may appear slight, especially if spread over ten or twelve years, but- and Dr. Perry agreed- similar costs must be added by monomer producers, PVC compounders, etc; all such costs are necessarily passed on to the consumer.

Data was presented from a UCC survey made at Texas City in June, 1974, on worker history. It identified 312 employees with 2007 manyears in vinyl chloride areas; average exposure was 47.5 ppm 8 hour twa. Of these, 80 had greater than ten years exposure with 23 greater than 20; no deaths were attributable to angiosarcoma. Current medical surveillance has found no cases of liver dysfunction from VCM exposure.

A Question and Answer session followed:

Q(Perry) How many people work in the VCM area?

A About 200.

Q What is their attitude?

A Generally, "So what?" They have accepted standard as a nuisance; no expressed fear of VCM. Two or three new employees have requested transfers or exclusion from the area.

Q Any women in the area?

A No; Medical Department advises against this.

C(Perry) This could lead eventually to a discrimination suit.

Q What is the Union stand?

A Neutral. Supported request for variance, however.

Q Do you offer medical surveillance?

A Yes; it is optional. Some have declined.

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- Q Has this changed your hiring strategy, eg, pre-employment screening?
- A If the job is in the VCM area, medical screening is conducted.
- Q Any rejections of new hires on medical grounds?
- A Don't think so; check with Dr. Glenn.
- Q Any respirator use problems?
- A No; some people may forget at times, but they generally try to follow procedure.
- Q Any exposure differences between Suspension and Solvent?
- A Not too much difference now; both average around 0.5 ppm 8 hour twa
- Q What specific projects are included in your costs?
- A VFAs, mechanical seals, Dynatrols, pressurize control room, strippers, tank car unloading, breathing equipment, etc.
- Q What are your ongoing expense items?
- A Industrial Hygiene, Medical Department, QC Lab, Unit surveillance, maintenance, training, etc.

A general discussion period followed:

- Perry How do you think the proposed noise standard will affect you?
- Levertton We are meeting 90 dbA now; going to 85 involves tremendous expenditures and untried technology; we're looking at literally millions of dollars.
(on isopropanol oils standard) The proposed standard is directed at isopropanol and not the oils caused by the strong acid process; these oils are the hazard. We are directing our efforts at the oils; since we use a weak acid process, we see no problem here.
- Perry OSHA is under tremendous pressure to produce standards.
- Eisenhour Do you think the Supreme Court will ever hear an OSHA standard?
- Perry Only if compelled to do so through an equal opportunity, discrimination, or similar suit.
- Frantz Are other companies in compliance with the VCM standard?
- Perry The initial statement is always, "We are in compliance."
But, no one will say that no employee is ever exposed in excess of the permissible limit.

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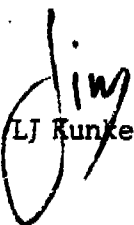
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Perry was given a walking tour of the Suspension Unit and a "drive-by" of the Solvent Unit. The VFA complexes were stressed and he was given the opportunity to speak with some of the operators.

Perry stated he is visiting several large producers while his research assistant, Randall Outlaw, is visiting the smaller ones; this is to avoid "cross-contamination" of thought. Their study should be published during the first quarter of 1977.

Comments: Dr. Perry seemed quite knowledgeable of and familiar with both sides of the VCM issue; he mentioned that his assistant has done a great deal of research on the subject. He appeared impressed with UCC's process and efforts at compliance, and was highly complimentary of our hospitality. I think we can expect an impartial report from him.


LJ Runke

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Addendum
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Meeting with C. R. Perry

M. E. Eisenhower provided Perry with copies of UCC appeal for review
of the standard to Circuit Court of Appeals and US Supreme Court;
also UCC petition for a Stay of the Standard.

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