



VRD 0002007319

PPG INDUSTRIES, INC./ONE GATEWAY CENTER/PITTSBURGH, PENNSYLVANIA 15222/AREA 412/434-2585

ZEB G. BELL, Jr., Sc.D., Director
Environmental Control, Industrial Chemical Division

July 31, 1974

Mr. John Stender
Assistant Secretary
Department of Labor
Room 3115
14th and Constitution Avenue, N.W.
Washington, DC 20210

Dear Mr. Stender:

The reason for this correspondence is to express my objection to the position taken by the American Chemical Society on the proposed permanent standard for vinyl chloride presented at the Public Hearing in Washington, DC.

The past president of AIHA requested in a telephone conversation that I represent the Association at the American Chemical Society meeting scheduled for May 21, 1974, on vinyl chloride. I received a confirming letter dated April 26 thanking me for consenting to represent the AIHA (Enclosure No. I). On April 29, 1974, Mr. H. H. Fawcett sent me a letter and additional correspondence (Enclosure No. II).

The American Chemical Society ad hoc Task Force met on May 21, 1974. The basic questions confronting the ACS were:

- 1) Should the Society take a position on the proposed standard?
- 2) Is VCM the chemical that has caused the problem?
- 3) In the opinion of the Society, is the proposed standard reasonable and appropriate?

The ad hoc Task Force on Vinyl Chloride had only two members currently employed in industry--myself (representing AIHA) and Mr. George Wilson of Firestone Tire and Rubber (representing the ASTM, E-34).

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The attendance at the ad hoc Task Force meeting on May 21 is shown in Enclosure No. III.

The outgrowth of this meeting was a draft of a position to be taken by the Society (Enclosure IV - May 23, 1974, cover letter from H. H. Fawcett and copy of first draft). This draft addressed itself to the basic rationale used in setting the proposed standard and not directly to the specifics of the proposed standard. Further, this draft did not indicate any endorsement of the proposed "non-detectable" level concept nor was technical feasibility discussed at the May 21, 1974, meeting. Upon review of the draft position by the Society, I had no major objections.

In the subsequent correspondence package from the Society (Enclosure No. V - transmittal letter from Mr. Halley Merrell, dated June 12, 1974, and from Mr. S. T. Quigley, dated June 7, 1974), it can be seen that a deadline of 5:00 p.m., June 12 was set for comments on the third revision of the draft. However, this draft was received in my office on June 13, 1974. Concurrently, I was on vacation during that entire week. In addition, the accompanying cover letter stated: "It would likely be helpful if the ad hoc Task Force and CCS members were on record as recommending Board approval of the statement. If you approve the statement, may I request that you telephone me immediately." I did not telephone approval.

Through retrospective deduction, I must assume there was a second draft which I did not receive or review.

Because of my extensive traveling, a recent bereavement, and a presumption that subsequent drafts would not deviate substantially from the original draft, I did not appreciate the substantive changes that were incorporated in the latest draft or the final testimony given by the American Chemical Society.

I was given no further opportunity to review the final position taken by the American Chemical Society nor was any other meeting of the ad hoc Task Force members called before the final position was presented at the Public Hearing.

Mr. John Stender
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I personally cannot support the final position taken by ACS nor do I believe that it is proper to necessarily imply that the AIHA endorses the American Chemical Society's position.

Very truly yours,



Zeb G. Bell, Jr.

ZGB:mal

Attachments

cc: Daniel Boyd - OSHA
Howard H. Fawcett - National Academy of Sciences
Paul Halley - Standard Oil Co.
Jerome H. Heckman - Keller and Heckman
Edward Kline - Office of the Solicitor
Donald Lassiter - OSHA
William E. McCormick - AIHA
John A. Pendergrass - AIHA
Stephen T. Quigley - ACS
Jerome T. Siedlecki - AIHA
W. Mayo Smith - Air Products
Henry Stremba - ASTM
George L. Wilson - Firestone



AMERICAN CHEMICAL SOCIETY
COMMITTEE ON CHEMICAL SAFETY

Attendance

A.C.S. Meeting on Vinyl Chloride

Marvel Hall - 21 May 1974

<u>Name</u>	<u>Mailing Address</u>
Dr. Victor Brum	VA Center, Medical Research Lab 15-A, Togus, Maine 04330
Dr. Zeb Bell	A.I.H.A., PPG Industries, 1 Gateway Center, Pittsburgh, PA 15222
Ms. Joan Broom	NAS-NRC, 2101 Constitution Ave., N.W. Washington, D.C. 20418
Mr. Howard Fawcett	NAS-NRC, 2101 Constitution Ave., N.W. Washington, D.C. 20418
Dr. Herman Kraybill	National Cancer Institute, National Institutes of Health, Bethesda, MD 2001
Dr. Donald Lassiter	OSHA, 1726 M St., N.W., Room 620, Washington, D.C. 20210
Dr. Nina McClelland	National Sanitation Foundation, P.O. Box 1468, Ann Arbor, Michigan
Dr. Bernard McNamara	Edgewood Arsenal, SAREA-CL, Aberdeen Proving Ground, MD 21010
Mr. Halley Merrell	A.C.S., 1155 16th Street, Washington, D.C. 20036
Dr. Glenn Schweitzer	EPA, Office of Water Programs, Division of Oil and Water Hazardous Materials, 401 M St., S.W., Room 1113 E, Washington, D.C. 20460
Dr. F.A. Van Atta	Office of Standards, Department of Labor, 1726 M St., N.W., Room 410, Washington, D.C. 20210 Stop #205
Dr. Elizabeth Weisberger	National Cancer Institute, National Institutes of Health, Bethesda, MD 20014
Mr. George White	NAS-NRC, 2101 Constitution Ave., N.W. Washington, D.C. 20418
Mr. George Wilson	ASTM, E-34, Firestone, Akron, Ohio



ENCLOSURE NO. IV
AMERICAN CHEMICAL SOCIETY
COMMITTEE ON CHEMICAL SAFETY

VRD 0002007323

23 May 1974

MEMORANDUM

To: Attendees at ad hoc Panel on Vinyl Chloride, May 21, 1974
Members, Committee on Chemical Safety

Subject: Proposed ACS Comments on Vinyl Chloride Regulation
(Federal Register, Vol. 39, No. 92, May 10, 1974,
Pages 16896-16900)

Please note the attached draft of the proposed statement by the Society on the vinyl chloride regulation. I have taken the liberty of editing this to a minor degree but am hopeful this contains your thoughts and opinions.

Due to the extreme urgency of time, we ask you to telephone any comments (either positive or negative) directly to the American Chemical Society so appropriate action can be taken as soon as possible. Specifically, if you will call Dr. Nathan J. Karch on telephone number 202-872-4466 or 4467, or Mr. Halley Merrell on 872-4610 (202) by noon Tuesday, May 28, we would greatly appreciate it. We would of course welcome any comments in writing, but recognizing the urgency of time, we must ask you please to telephone your comments to Dr. Karch or Mr. Merrell.

Your continuing cooperation in this matter will be greatly appreciated by the ACS, by Dr. Victor Brum who chaired the meeting, and by myself.

Sincerely yours,

H. H. FAWCETT
Chairman
Committee on Chemical Safety

HHF:rj

Enclosure

RECEIVED

MAY 24 1974

MFG. DEPT.

The American Chemical Society has a strong interest and recognizes its responsibilities to both the public and the private sectors concerning both the benefits and potential hazards from chemicals and their uses. For these reasons, we have noted and carefully reviewed the most recent information on the subject of vinyl chloride in occupation exposures and its relationship to sarcomas.

Angiosarcoma is a rare carcinogenic lesion in the general population. The appearance of angiosarcoma in occupationally exposed groups, much higher than in the general population, shows a casual relationship for an occupational vector. There is enough data to characterize vinyl chloride as a carcinogen--a potent hepatocarcinogen. There is sufficient data to indicate that this is a carcinogen for other sites, i.e., kidney, bone. Epidemiologically, this should be sought for beyond liver. Survey reports now show extrahepatic angiosarcoma.

Referring to Federal Register, May 10, 1974, pages 16896-16900, Vol. 39, No. 92 [29 CFR Part 1010], (f)i), it is suggested a grace period of reasonable but limited duration be extended for industry to meet these standards considering engineering design and their economic effects, with feasible controls to be instituted as soon as possible.

Regarding limits of exposure, the following quotation, extracted from page 11 of the report, CHEMICALS AND HEALTH, Report of the Panel on Chemical and Health of the President's Science Advisory Committee (National Science Foundation) September 1973, chaired by Professor John W. Tukey, appears germane to the subject:

"A 'no-detectable amount' clause is a refuge in the face of ignorance. Were mature scientific knowledge presently available regarding dose-response relationships and extrapolation to man, the problem of carcinogenicity could be dealt with a scientifically rational manner. We have good reason to believe--though it is not yet proved--that some, perhaps most, chemical carcinogens will have definable thresholds."

Vinyl chloride has an apparent threshold and a definable dose response curve.

Regarding (g) and (h), we endorse the control methods outlined but suggest further consideration to the possible air-supplied suits fabricated from material impervious to the expected exposure. The air supplied for breathing must be as good as or better than that required by CFR 1910.134.

Consideration should be given by NIOSH/B of M for an approval schedule commensurate with specific needs for protective equipment for vinyl chloride and polyvinyl chloride exposures and appropriate maintenance and decontamination procedures for such equipment.

We strongly endorse the concept that transporters or disposers of any chemical, including vinyl chloride, should be properly informed of the potential hazards and adequately trained in the safety precautions to be observed.

The American Chemical Society continues to encourage the rapid and wide dissemination of information and data on the potential hazards of chemicals, and will continue to provide a forum for such purposes on all chemicals and chemically-related substances.

applicant will be the date of the loan and the date from which interest accrues. (20 U.S.C. 445(3))

§ 142.43 Repayment.

(a) *Schedule of repayments.* Repayments of principal with accrued interest shall be made on those dates as may be agreed upon by the Commissioner and the applicant.

(b) *Date of maturity.* A loan may be made for any period of time except that the date of maturity shall be not more than ten years after the date on which the loan is made.

(c) *Prepayments.* Loans may be prepaid in full or in part at any time, with accrued interest to the date of payment, without penalty for prepayment.

(20 U.S.C. 445(4))

§ 142.44 Reports and records.

(a) *Reports.* Each applicant receiving a loan shall furnish a completion report upon completing the approved project, and shall furnish such progress or other reports as the Commissioner may from time to time require regarding the use of loan funds. The completion report shall be submitted by the last day of the fiscal year following the fiscal year in which the application was approved unless the Commissioner extends the period upon the written request of the applicant.

(b) *Records.* Each applicant receiving a loan shall keep the loan in a separate bank account or maintain a separate accounting of all such funds sufficient readily to identify all transactions with the loan funds. Each applicant shall also maintain intact all records supporting the use of loan funds for three years after the loan has been repaid in full. Such records shall be made available to fiscal representatives of the Government for audit purposes.

(20 U.S.C. 1232(b) (2), (3))

[FR Doc. 74-1678; Filed 7-22-74; 8:45 am]

DEPARTMENT OF TRANSPORTATION

Coast Guard

[33 CFR Part 157]

[CGD 74-32]

TANK VESSELS ENGAGED IN DOMESTIC TRADE

Protection of Marine Environment; Notice of Proposed Rulemaking Correction

In FR Doc. 74-4804 appearing at pages 24150-7 in the issue for Friday, June 23, 1974, the following corrections should be made:

1. In § 157.07(e) (1), appearing at page 24153, the word "blible" should read "visible".

2. Following § 157.11, appearing at page 25151, a note should be added reading as follows:

NOTE: An existing vessel must comply with the requirements in § 157.11 before December 31, 1977.

3. In § 157.20(a), appearing at page 24155, the word "and" should read "or".

4. In section 3(a) (2) in Appendix A, appearing at page 24156, the formula in the definition for K₁ should read

$$\frac{b_1}{L_1}$$

5. In section 3(b) in Appendix A, appearing at page 24156, the formula in the definition for S₁ should read

$$\frac{1}{L_1}$$

6. In section 3(c) (2) in Appendix A, appearing at page 24156, the word "is" should be added after "h" in the second sentence.

7. In section (3) (c) in Appendix B, appearing at page 24156, the first sentence should read as follows:

Where damage involves transverse bulkheads as specified in paragraphs (a) (1) and (2) of this section, transverse watertight bulkheads must be spaced at least at a distance equal to the longitudinal extent of the assumed damage specified in paragraph (b) of this section in order to be considered effective.

Dated: July 18, 1974.

D. H. CLIFTON,
Captain, U.S. Coast Guard, Acting
Chief, Office of Merchant
Marine Safety.

[FR Doc. 74-1678; Filed 7-22-74; 8:45 am]

[45 CFR Parts 40, 151]

[CGD 74-167]

VINYL CHLORIDE

Proposed Carriage Requirements

The Coast Guard is considering amending the bulk dangerous cargoes regulations for the carriage of vinyl chloride (vinyl chloride monomer) by requiring venting, gauging and cargo transfer systems which provide greater protection to personnel than those presently permitted. These amended regulations will apply to all tank vessels, both existing and new construction, carrying vinyl chloride.

Written comments. Interested persons are invited to participate in this proposed rulemaking by submitting written data, views, or arguments to the Executive Secretary, Marine Safety Council, U.S. Coast Guard Headquarters (CG-MSC/32), Room 8231, 400 Seventh Street, SW., Washington, D.C. 20590. (Telephone 202 426-1477). Each person submitting comments should include his name and address, identify the notice (CGD 74-167), and give reasons for any recommendations. Comments received will be available for examination by interested persons in Room 8231, Department of Transportation, Nassif Building, 400 Seventh Street, SW., Washington, D.C. Copies will be furnished upon payment of fees prescribed in 49 CFR 7.31.

Public hearing. The Coast Guard will hold a hearing on August 15, 1974, at 9:30 a.m. in Conference Room 5331, Department of Transportation, Nassif

Bldg., 400 Seventh Street, SW., Washington, D.C. Interested persons are invited to attend the hearing and present oral or written statements on this proposal. It is requested that anyone wishing to attend the hearing notify the Executive Secretary at least ten days in advance of the time needed for his presentation. Written summaries or copies of oral presentations are encouraged.

Closing date for comments. All communications received before September 6, 1974, will be evaluated before final action is taken on this proposal. Proposed regulations may be changed in the light of comments received.

The Occupational Safety and Health Administration, Department of Labor, announced in the Federal Register, Friday, April 5, 1974 (39 FR 12342) that vinyl chloride is carcinogenic for humans and that the new exposure standard for vinyl chloride is 50 ppm. OSHA also announced in the Federal Register of Friday, May 10, 1974 (39 FR 14115) that new level of exposure standard of "detectable level" is proposed. Prior Coast Guard regulations for vinyl chloride permit restricted gauging and venting of vinyl chloride to the atmosphere during cargo transfer operations. Since both the use of a restricted gauge and the venting of vinyl chloride vapors to the atmosphere during cargo transfer operations result in vinyl chloride concentrations in excess of 50 ppm, action was necessary to provide protection personnel from this danger.

Accordingly, the Coast Guard directed by message (131512Z July 1974) interim measures to prevent exposure of personnel to vapors during cargo transfer operations. These interim measures are proposed to be superseded by the following regulations:

(a) Prohibition of liquid level gauge other than closed gauges on cargo tanks containing vinyl chloride.

(b) Prohibition of venting of vinyl chloride vapors to the atmosphere during cargo transfer operations (containment of vapor return to shore product stream).

(c) Requirement of continuous detection for vinyl chloride vapor leaks on tank vessels undergoing vinyl chloride transfer operations.

(d) Discontinuing of transfer operations whenever vinyl chloride vapor concentrations in excess of 50 ppm are detected.

(e) Requirement of purging of oil lines to a shore process stream following completion of cargo transfer operations before disconnecting cargo piping to reduce vinyl chloride vapor concentrations to 50 ppm or less.

The proposed exposure limit of 50 ppm may be changed as a result of OSHA exposure limit determined after the July 25, 1974 hearing, and comments on the following proposed regulations should be made with this fact in mind.

In consideration of the foregoing, it is proposed to amend Parts 40 and 151, Chapter I, Title 46, Code of Federal Regulations as follows:

1. By amending Part 40 of Chapter I, Title 46, Code of Federal Regulations by adding a new Subpart 40.15—Vinyl Chloride, applicable to all tankships carrying vinyl chloride in bulk, as follows:

Subpart 40.15—Vinyl Chloride (Vinyl Chloride Monomer)

§ 40.15-1 General-T/MIL

(a) A tank containing vinyl chloride may not have any liquid level gauges, other than closed gauges.

(b) The person in charge of cargo transfer shall ensure:

(1) That cargo vapors are returned to a shore process stream during cargo transfer operations;

(2) That continuous detection for vinyl chloride vapor leaks is conducted aboard a tankship undergoing vinyl chloride transfer operations, with detection capability of 1 ppm=0.5 ppm;

(3) That cargo transfer operation is aboard a tankship undergoing vinyl chloride vapor concentration in excess of 50 ppm is detected; and

(4) That upon completion of cargo transfer, before disconnecting cargo piping, all cargo lines are purged to a shore process stream to reduce vinyl chloride vapor concentrations to 50 ppm or less.

2. By changing the requirement for gauging in Table 151.55—Summary of Minimum Requirements for vinyl chloride from restricted to closed.

3. By adding paragraphs (g) and (h) to § 151.55-34 containing special requirements for the carriage of vinyl chloride:

§ 151.55-34 Vinyl Chloride (vinyl chloride monomer).

(g) A tank containing vinyl chloride may not have any liquid level gauges, other than closed gauges.

(h) The person in charge of cargo transfer shall ensure:

(1) That cargo vapors are returned to a shore process stream during cargo transfer operations;

(2) That continuous detection for vinyl chloride vapor leaks is conducted aboard a tank ship undergoing vinyl chloride transfer operations, with detection capability of 1 ppm=0.5 ppm;

(3) That cargo transfer operation is discontinued whenever a vinyl chloride vapor concentration in excess of 50 ppm is detected; and

(4) That upon completion of cargo transfer, before disconnecting cargo piping, all cargo lines are purged to a shore process stream to reduce vinyl chloride vapor concentrations to 50 ppm or less.

(50 Stat. 597; 46 U.S.C. 155, 501a, 575, 413 (2) U.S.C. 1555(a) (1); 43 CFR 145 (b) and (c) (1))

Dated: July 18, 1974.

D. H. CLIFTON,
Captain, U.S. Coast Guard, Acting
Chief, Office of Merchant
Marine Safety.

[FR Doc. 74-16725 Filed 7-22-74; 9:15 am]

Federal Aviation Administration

[14 CFR Part 71]

[Airspace Docket No. 74-GL-15]

CONTROL ZONE

Proposed Designation

The Federal Aviation Administration is considering amending Part 71 of the Federal Aviation Regulations so as to designate a control zone at Aurora, Illinois.

Interested persons may participate in the proposed rule making by submitting such written data, views or arguments as they may desire. Communications should be submitted in triplicate to the Director, Great Lakes Region, Attention: Chief, Air Traffic Division, Federal Aviation Administration, 2300 East Devon Avenue, Des Plaines, Illinois 60018. All communications received on or before August 22, 1974, will be considered before action is taken on the proposed amendment. No public hearing is contemplated at this time, but arrangements for informal conferences with Federal Aviation Administration officials may be made by contacting the Regional Air Traffic Division Chief. Any data, views or arguments presented during such conferences must also be submitted in writing in accordance with this notice in order to become part of the record for consideration. The proposal contained in this notice may be changed in the light of comments received.

A public docket will be available for examination by interested persons in the Office of the Regional Counsel, Federal Aviation Administration, 2300 East Devon Avenue, Des Plaines, Illinois 60018.

An FAA control tower will be commissioned at the Aurora Municipal Airport, Aurora, Illinois.

A control zone will be required when the control tower is in operation and will have the same effective hours of the tower.

In consideration of the foregoing, the Federal Aviation Administration proposes to amend Part 71 of the Federal Aviation Regulations as hereinafter set forth:

In § 71.171 (39 FR 734), the following control zone is added:

AURORA, ILLINOIS

That airspace within a 5-mile radius of the Aurora Municipal Airport (latitude 41°46'20" N., longitude 88°23'25" W.), and within 1 1/2 miles either side of the DuPage VOR 217° radial extending from the five-mile radius to 7 1/2 miles NE of the Aurora Airport. This control zone is effective during the specific days and times established in advance by Notice to Airmen. The effective date and time will thereafter be continuously published in the Airmen's Information Manual.

(Sec. 507(a) of the Federal Aviation Act of 1958 (49 U.S.C. 1313), and sec. 6(a) of the Department of Transportation Act (49 U.S.C. 1555(c)))

Issued in Des Plaines, Illinois, on July 3, 1974.

R. O. ZIEGLER,
Acting Director,
Great Lakes Region.

[FR Doc. 74-16725 Filed 7-22-74; 9:45 am]

[14 CFR Part 71]

[Airspace Docket No. 74-GL-24]

TRANSITION AREA

Proposed Alteration

The Federal Aviation Administration is considering amending Part 71 of the Federal Aviation Regulations so as to alter the transition area at Sandusky, Ohio.

Interested persons may participate in the proposed rule making by submitting such written data, views or arguments as they may desire. Communications should be submitted in triplicate to the Director, Great Lakes Region, Attention: Chief, Air Traffic Division, Federal Aviation Administration, 2300 East Devon Avenue, Des Plaines, Illinois 60018. All communications received on or before August 22, 1974, will be considered before action is taken on the proposed amendment. No public hearing is contemplated at this time, but arrangements for informal conferences with Federal Aviation Administration officials may be made by contacting the Regional Air Traffic Division Chief. Any data, views or arguments presented during such conferences must also be submitted in writing in accordance with this notice in order to become part of the record for consideration. The proposal contained in this notice may be changed in the light of comments received.

A public docket will be available for examination by interested persons in the Office of the Regional Counsel, Federal Aviation Administration, 2300 East Devon Avenue, Des Plaines, Illinois 60018.

A standard instrument approach procedure has been developed based upon the relocated Sandusky VOR. Accordingly, it is necessary to alter the Sandusky, Ohio transition area to adequately protect the aircraft executing this procedure.

In consideration of the foregoing, the Federal Aviation Administration proposes to amend Part 71 of the Federal Aviation Regulations as hereinafter set forth:

In § 71.151 (39 FR 430), the following transition area is amended to read:

SANDUSKY, OHIO

That airspace extending upward from 500 feet above the surface with a 5-mile radius of the Grifing Sandusky Airport (latitude 41°35'01" N., longitude 82°09'00" W.), within 3 miles either side of the Sandusky VOR 193° radial extending from 1 1/2 mile radius to 7 1/2 miles east of the airport excluding that portion that overlaps the Port Clinton transition area.

(Sec. 507(a) of the Federal Aviation Act of 1958 (49 U.S.C. 1313), and sec. 6(c) of the

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CHEMICAL
RESEARCH

AUG 6 1974

August 2, 1974

Dr. Robert W. Cairns
Executive Director
American Chemical Society
1155 Sixteenth Street, N.W.
Washington, D. C. 20036

Dear Dr. Cairns:

The position taken by the American Chemical Society in regard to vinyl chloride monomer (VCM) safety standards (C&EN, July 15, 1974, page 4) may appear to many readers as well thought out, in view of the fact that it was developed by the Committee on Chemical Safety and reviewed by Committees on Environmental Improvement and on Chemistry and Public Affairs, followed by approval from the Board of Directors of the Society. It may, on the contrary, represent a dangerous position for the chemical industry as a whole, and in this specific instance is a position that is simply not consistent with the realities imposed by an industrial society.

No serious doubt can be raised as to the carcinogenicity of VCM, nor is there any doubt whatever that a major effort must be made to reduce the exposure of workers to VCM. There is also no doubt whatever that these efforts are under way in full scale by every segment of the industry with results that are, we believe, already dramatic in the reduction of VCM levels. There will continue to be a reduction in VCM levels that finally reach an extremely low and irreducible minimum, but at a level, however, that no one should permit himself to think will be "undetectable". No mechanical apparatus within the compass of industrial practice is destined to provide containment to such a degree that no analytical method will be able to detect it.

The Society's support of a proposed standard bearing a "no detectable level" requirement, and its recommendation of a "minimum practical" detectable level are consistent steps only if the latter is conceived in the vicinity of 1 ppm. We are returned, thus, to the prospect of an impossible demand on an industrial operation.

The ACS must be aware better than most organizations that chemicals are at least two things:

1. They are at the very heart of a modern society;
2. They are in most cases not pleasant in their effects when people are exposed to them in excess of certain levels.

Dr. Robert W. Cairns

August 2, 1974

VRD 0002007329

The Society also knows that the larger society can survive the existence of the chemicals it needs, better, in fact, than it can survive, in the civilized form it prefers, without them. The Society must also know that the experience and judgment of those at the heart of an industry can have something of value to say about the issues arising within that industry. One wonders if the Society consulted in any depth with the VCM-PVC industry itself in arriving at its decision. (So often it is that those who know the most are consulted the last and are believed the least.) One wonders if the Society's Board of Directors have much experience in what VCM polymerization plants are like now versus what they were five years ago; whether the Committee on Chemistry and Public Affairs knows enough to accurately assess the question of PVC plant operations in space suits; whether the Environmental Improvement Committee can really be sure that any chemical is safe if present at a detectable level, or that VCM is a life threat at the industry-proposed levels.

The ACS position is not far now from its own reduction to absurdity, which would be a posture that all chemicals must be manufactured under an essentially no-detectable ruling. That posture contains, as the Society knows, the same know-nothing quality as the pithy observation by one witness at the OSHA hearings to the effect that having lived for 200 years without PVC we can commence doing so again.

It needs no repeating to say that industry, now aware of the VCM problem, is determined to cope with it. Nor does industry want no tough standards and time targets imposed. Industry does want a sense of reality to prevail and would have expected the ACS to be a leader in this direction. No matter how august the approval process in reaching its position, that position taken would in truth appear too briefly considered and non-responsible for the Society whose conceptions of the chemical industry should be without peer.

Yours very truly,

MLS:ow

cc: Mr. Albert F. Plant, Editor
Chemical & Engineering News