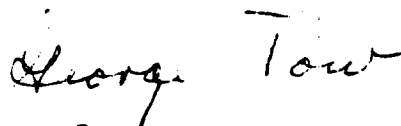


Managers' Notice
No. 531
May 31, 1974

Subject: Customer Communication - Government
Proposed VCM Exposure Standard

The attached communication was sent to all our vinyl plastics, vinyl latex, elastomer polyblend, selected Abson customers and our field sales force. Direct contacts will be made with key customers to enlist their active support.

If you can be of any assistance, please contact W. S. Lodge or P. J. Weaver, Cleveland Marketing.



George Pow
Director of Employee Relations
B.F. Goodrich Chemical Company

Distribution: Cleveland Office
(Plants & Technical Centers --
TWX & Telecopier)

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B. F. Goodrich Chemical Company

A DIVISION OF THE B. F. GOODRICH COMPANY

8100 OAK TREE BOULEVARD • CLEVELAND, OHIO 44131 • PHONE: 216-524-0200

May 30, 1974

Urgent!

Gentlemen:

In our last communication with you on May 14, 1974 relative to OSHA's proposed standard for exposure to vinyl chloride monomer, we mentioned that we would contact you when we believed your assistance would be appropriate in preparation for OSHA hearings. OSHA (Occupational Safety & Health Administration, Department of Labor) has set a hearing date of June 25, 1974. This early date was unexpected. Your assistance is needed now!

On May 10, 1974 OSHA published a Proposed Permanent Standard for Exposure to Vinyl Chloride Monomer with allowable exposure to vinyl chloride limited to "non-detectable" level. Please refer to Federal Register, Volume 39, Number 92, pages 16896-16900 dated May 10, 1974. This proposed standard covers vinyl chloride manufacturing, polyvinyl chloride resin manufacturing and we believe that vinyl material processors, such as your company, are intended to be included.

The proposed standard would require that you monitor vinyl chloride levels, provide detailed medical exams and medical surveillance programs, provide air fed respirators, full body protective clothing and keep detailed records. We question whether this provision is practical for you as a vinyl material processor or justified by medical data based on human experience. If you have data relative to the probable vinyl chloride exposure level to your workers over an extended period of time together with medical data you should submit information to OSHA.

A non-detectable level does not appear to be possible with current technology and, if imposed, would ultimately cause the discontinuance of PVC production. The Society of the Plastics Industry noted in a news release of May 10, 1974 that a reduction to exposure levels as proposed would make it virtually impossible for PVC plants to operate. Time is required to break technological barriers. Given time, we are confident that we can develop the technology and equipment to reduce substantially vinyl chloride exposure in our plants and reduce residual vinyl chloride in the dry resin. This will result in negligible exposure to your workers.

Since substitute raw materials and equipment are not readily available to replace PVC materials, the social and economic impact on you and your

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customers could be expected to be severe. We believe it is imperative that you contact OSHA so that they understand the significance of a major cut-back of vinyl material production to your company, your employees, and your community. You should respond no later than June 10 to OSHA if you plan only a written comment. You are invited to prepare economic impact statements as outlined in the Federal Register notice, Volume 39, Number 80, page 14522 - April 24, 1974.

For example, if you manufacture vinyl insulated wiring for automotive, appliance, construction and communications applications you could state that you are not equipped to substitute rubber insulation and that a specific number of jobs would be eliminated. Further, you should indicate that your customers for these applications have agreed that they would not have a suitable substitute and would have to discontinue manufacture thus eliminating thousands more jobs down the line. Assuming substitute raw materials were available you should give an estimate of the number of years needed for engineering, design and installation of new fabricating equipment.

Your appearance at the hearing in person would be a stronger and more effective way of getting your views across. It is scheduled for June 25, 1974 in Washington, D. C. and you can refer to the Federal Register, Volume 39, Number 102, page 18303 dated May 24, 1974 for details. If you are able to appear in person you will have to file notice by June 17 with:

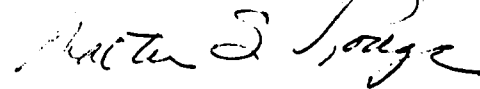
Ms. Joanne Goodell
Docket OSH-36: OSHA
1726 M Street, N. W., Room 200
U. S. Department of Labor
Washington, D. C. 20210

In summary, you must respond to Mr. John Stender, Assistant Secretary of Labor, at the above address by June 10 if you plan a written statement and by June 17 to Ms. Goodell if you plan to appear and comment at the hearing. The Federal Register issues referred to in this letter are available from our field sales offices.

We are confident you will do your part to see that OSHA weighs risk and benefit in preparing a workable standard.

Yours very truly,

B.F. GOODRICH CHEMICAL COMPANY



Walter S. Lodge
General Sales Manager

/ja

P.S. If you present any comments, we would appreciate a copy.

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15. A number of MSDS sheets were prepared and entered into HYTOX in response to special requests from various business units. These were chiefly in response to requirements by customers for MSDS's before purchase of products. Mr. Modrell has been able to meet the time requirements on all of these. Also, there were several requests for printouts of existing MSDS files. All these requests were filled by Ms. Dillon and Mr. Modrell.
16. A report was created by Ms. Pearcy for K. Stimler listing requested items from the database with specific fields included to assist in dealing with problems raised by California Proposition 65.
17. Last year we received numerous boxes of tissues from previous toxicology studies for permanent storage within BFG. A secured area has been established at the Brecksville warehouse and these have been transferred there.

Periodically the wet tissues must be checked for leakage of the formalin preservative. Ray Taylor and Dr. Hinderer checked a few of these boxes and repackaged a number of tissue specimens from the dominant lethal and reproductive studies on CR-18. They will need to check approximately 100 boxes sometime this summer.

18. Based on the cost and time estimates we obtained, the SP&C Division has decided to conduct toxicology evaluation to support the use of Carbopol made with ethyl acetate as a carrier for a new pediatric pharmaceutical. We have requested draft protocols for absorption and 30-day feeding studies in rats. 90-day and 6-month studies in rats and dogs will be needed in the future.
19. At the request of the Geon Division Dr. Hinderer provided a critical review of the NBS study "Fire Toxicity Scaling." This report dealt with an evaluation of the NBS N-gas model for predicting fire toxicity from materials. The model appeared to correlate well with large scale test but not the small scale NBS combustion toxicity test.
20. Twenty-one documents derived from work done on BioFilm 102 were submitted to the National Center for Devices and Radiological Health for inclusion in Device Master File MAF #54. These documents will be used to support a Premanufacturing Authorization (PMA) for BioFilm. Sales are anticipated in the second half of 1987.

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21. One of our customers, Premier Chemicals, has an application for Carboset 514 in freeze protection and fertilization control for agricultural products. Mr. Bachtel reviewed this application with the EPA. So long as no pesticidal claims are made, this application falls outside of FIFRA and no registration or contact with the agency is required. This information has been relayed to the customer.
22. Mr. Bachtel met with representatives of Dow and DuPont on May 19, 1987 to plan our strategy for the pre-petition meeting with FDA for the next day. Dow, DuPont and BFG plan to petition to amend 21CFR 177.2600 "Rubber Articles for Repeated Use" to include polyether urethanes.

Joint submission of a petition by competitors and raw material suppliers is unusual for FDA. However, they did not foresee any problems in handling such a petition. As anticipated, FDA did not accept our minimal proposal; however, the amount of data requested was less than normally required in the past. BFG, Dow and DuPont will share the work required. BFG and Dow will write the final petition, submitting separate sections on the manufacturing process and environmental assessment as appendices to the main petition. Since these sections may contain confidential business information, it will be necessary to submit them separately. A tentative timetable has been developed calling for submission of the final petition in January of 1988.

23. The pace of TSCA Section 4 test rule development within EPA has slowed somewhat over the last six months. This has resulted in a beneficial delay of the finalization of the test rule on MBT and the promulgation of those for the other rubber chemicals. On the negative side NTP has reported that MBT is carcinogenic in rats. These results are expected to have an adverse effect on other MBT-based chemicals such as MBTS which is metabolized to MBT.

The CMA Rubber Additives Panel met this month to discuss these new developments and to plan for future activities. Because of the similarities between MBT and MBTS the group discussed the possibilities of conducting a cancer bioassay with MBTS. The panel members felt that this would also help answer unresolved issues regarding the MBT cancer bioassay.

Another highlight of the meeting was the efforts of the Panel to get importers to share in the testing costs.

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Under TSCA EPA can require importers and users to share in the costs of mandated testing. CMA distributed a draft letter to pay now and have some input or be on notice that we will ask later.

24. Toxicological evaluations of Norcat M, S, and AS have been completed. Toxicology summaries were prepared and were submitted along with the test reports for inclusion in the PMN on the products.
25. Ms. Dillon is presently working with Elmer Nowak, Chemical Group MIS, to provide us with access to the Chemical Company's Recipe File. The access process is currently being revised.
26. 144 reports were processed by Ms. Butterfield for the A&DD Workers' Compensation Department.
27. Employees at Avon Lake have expressed concern over a possible excess of bronchitis and pneumonia in the Polymer Chemicals Semi-works at Avon Lake. This was discussed in a meeting at Avon Lake on May 29 and actions to better define the problem and to reduce exposure to possible offending chemicals were agreed upon. Henry and Akron Chemical which have similar operations are to be advised.
28. Dr. Dietz participated in a UGTC safety managers' meeting on May 5 and 6. Topics of discussion included medical monitoring, MSDS and the Medical Surveillance System.
29. Ms. Butterfield spent three days training Phyllis Siebel at Uniroyal-Goodrich in data entry and report request for the Medical Surveillance System. We will continue to support their system through advice, coding and audio and pulmonary reviews.
30. USP Class VI - Biological Tests for Plastics were performed on three Geon experimental compounds. Only one of the three compounds passed the tests as run. In spite of recommendations to have the tests run at the lower standard extraction temperature (50°C), Avon Lake has had them performed at 121°C. This is a very severe test for PVC, way above normal use temperatures. This may likely be the reason for the failures.


Harold W. Dietz

jp

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