



Robert D. Johnson

The B. F. Goodrich Company

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ADDRESS REPLY TO: DEPT 0020 0108 5-H

April 22, 1975

*Ray -- Is
Someone going to
attend for ETR?
H*

TO DISTRIBUTION (ATTACHED):

Dr. Ralph Cook of Dow Chemical Company and I feel that it would be desirable for some of the physicians who are responsible for employees exposed to vinyl chloride to get together for an exchange of ideas on our testing programs. We feel it would be useful to review our experiences to date and to discuss our plans for the future.

Although the vinyl chloride standard outlines a specific examination, it does allow some latitude on the part of the examining physician, and I am sure that there is by no means any unanimity of opinion as to how the results should be interpreted.

We are going to meet at the Sheraton-Hopkins Hotel at the Cleveland Airport at 9:00 A.M. on May 13th. We would welcome the medical representative(s) from your company to participate in the discussion. We have reserved a meeting room at the hotel, but you should make your own travel and lodging arrangements.

We thought that, at the time of this meeting, it might also be appropriate to discuss the medical aspects of the proposed EPA vinyl chloride standard.

Since I will be traveling during the next two weeks, please let my secretary know if you or anyone from your company plans to attend. (216-379-3298).

Sincerely,

M. N. Johnson
M. N. Johnson, M.D.
Director
Department of Environmental Health

v

GENC 006411

Vinyl-Chloride Emissions Would Be Cut 90% Under Standard Proposed by EPA

By a WALL STREET JOURNAL Staff Reporter

WASHINGTON—Declaring that a health risk exists for 4.6 million people living near vinyl-chloride plants, the government proposed requiring a 90% cut in air emissions of the cancer-linked chemical.

The standard proposed by the Environmental Protection Agency would require that the 60 or so existing manufacturers of vinyl chloride and two sister compounds, ethylene dichloride and polyvinyl chloride, install "best available" technology to limit emissions from their plants. Concentrations of the chemicals in air around the plants, currently average less than one part per million, the EPA said. The new standard would reduce that level to about 0.1 part per million.

Vinyl-chloride gas is used primarily in the plastics industry to make polyvinyl chloride, or PVC, a plastic that is widely used in consumer products and construction. It has been under intense scrutiny, spurred in part by a B. F. Goodrich Co. unit report in January 1974 that several of its employees had died from a rare liver cancer linked to exposures to the gas.

EPA Administrator Russell Train said that his agency doesn't know precisely what level is low enough to eliminate any cancer risk but that he hopes the proposed standard will reduce most of the cancer cases traced to the substance. From one to 20 cases of cancer each year are attributable to vicinity exposure to vinyl chloride, he said.

Cost to Manufacturers

Mr. Train said that meeting the new standard would cost manufacturers about \$198 million plus another \$70 million each year to maintain the required emission levels.

That cost, he said, could force four small plants, or 0.5% of the industry, to close. These facilities, according to the EPA, are Occidental Petroleum Corp.'s polyvinyl-chloride plant in Hicksville, N.Y., and three Jannet Corp. polyvinyl-chloride plants in Torrence, Calif.; Tucker, Ga., and Somerset, N.J. The plants employ a total of 30 workers.

Mr. Train said the agency considered requiring that emissions be eliminated entirely but feared that such a stringent standard would effectively close the entire industry. Because the lapse between exposure to vinyl chloride and the appearance of cancer may be as much as 20 years, Mr. Train said the EPA couldn't ignore the growing

public exposure to the gas. Vinyl-chloride production is up about 900% from 15 to 20 years ago.

In October 1974, after months of fact-finding and hearings marked by bitter controversy, the Labor Department ordered a cut in worker exposure to vinyl chloride within the plant to one part per million from the previously allowed 50 parts per million. Industry officials had warned that the rule was so harsh it could lead to a total close-down of plants making PVC plastic vinyl-chloride gas.

So far, however, only Uniroyal Inc. has announced plans to close a plant rather than meet the worker-exposure standards. It plans to close its Painesville, Ohio, PVC resins plant by March 1.

The new EPA standard won't be adopted formally until after a 45-day period for public comment and a public hearing. Mr. Train said he hopes to complete the process by late spring. Manufacturing plants would then have 90 days to install the emission-control equipment or to apply for an extension. The agency could grant extensions of up to two years.

Industry spokesmen agreed on the need to restrict plant emissions of vinyl-chloride gas but at the same time denied there was any known risk from such leaks into the atmosphere.

"In the Public Interest"

"We don't believe that there is any current, nor has there been any past, risk to the health of individuals residing in the proximity of vinyl-chloride gas and polyvinyl-chloride-resin plants, but the VCM-PVC producers agree that rigorous emission controls are in the public interest," said Ralph L. Harding Jr., president of the Society of the Plastics Industry Inc.

The society represents makers of 99% of the vinyl-chloride-monomer and polyvinyl-chloride plastic made in the U.S. Mr. Harding said his group views the EPA's action as "primarily a precautionary step." But he noted that the EPA's proposed standard hasn't been studied in detail by industry representatives and that further comment will be made within the normal rule-making procedures preceding imposition of the requirement.

A spokesman for B. F. Goodrich Chemical Co., a unit of B. F. Goodrich Co., said in Akron, Ohio, "We recognize that there is a need for control requirements and emission limitations." He said the company expects to be able to meet the requirements, even though untried technology would have to be developed to do it.

Goodyear Tire & Rubber Co., another major maker, said the proposed standard is attainable "and poses no overriding problem for Goodyear, which already is well along the way to meeting it." A spokesman said in Akron that the company expects to make "rather substantial" capital expenditures to meet the standard and that "regrettably, these additional costs ultimately will be reflected in product costs."

Both companies declined to estimate the cost to them of meeting the EPA regulation.

Tenneco Inc. said in Houston that it is currently in compliance with some sections of the proposed regulation and would be able to meet the rest within the EPA's time limit.

R. N. Johnson



INTER-ORGANIZATION MEMO

TO: DISTRIBUTION

RECEIVED

ATTENTION:

FROM: W. C. Douglas

DATE: February 17, 1975

SUBJECT: Strength of Low VCM Products

The data listed below show the strength of products produced early in 1974 compared to late in 1974 after the VC in the resin was substantially reduced. Fisher Body has been told that a small amount of VC improved physical properties of PVC products. The data below show this is not true. The data also show we are low in some of our physical properties compared to the specifications. We should not give these figures to Fisher Body.

It should be noted that T-10812 as produced at Textileather is made from plastisol resin. We do not have a good story on whether the plastisol resin differs in VC levels in the period shown.

Textileather Production - Averages

	T-9012				T-10812			
	Tensile		Tear		Tensile		Tear	
	W	F	W	F	W	F	W	F
Pilot Samples, Early 1974	97.10	89.57	5.61	4.10	91.14	83.28	5.76	4.52
Production After September, 1974	98.27	91.09	5.24	4.18	96.05	88.45	5.96	4.94
Specification	90.00	90.00	5.00	3.50	90.00	90.00	5.50	4.50

WCD
W. C. Douglas

WCD:jlr

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