

FILE MEMORANDUM

W C Koch

SUBJECT:

NIOSH-RECOMMENDED OCCUPATIONAL HEALTH STANDARD FOR THE
MANUFACTURE OF SYNTHETIC POLYMER FROM VINYL CHLORIDE

March 20, 1974

Industry representatives (PVC/VCM producers) convened at MCA Headquarters on Tuesday, March 19, 1974 to review NIOSH recommendations concerning subject health standards. The meeting was chaired by Mr. A. Vitone - President B. F. Goodrich Chemical.

Mr. Vitone's opening comments focused on recent rejection by NIOSH (attached 3/11/74 correspondence) of the concept of a threshold limit for vinyl chloride gas in the atmosphere. This posture of "zero tolerance" (no minimum threshold level) adopted by NIOSH was described by Mr. Vitone as a precursor to shut-down of the industry should the present recommended standards be promulgated. Issuance of the proposed regulations (OSHA) was described by Mr. Vitone as imminent with the possibility of DOL action by March 22, 1974.

A summary of immediate action items agreed to by a majority of industry representatives present follows:

1. (1) Issuance of a statement to OSHA within 1-2 days regarding industry's position (incompatibility with zero tolerance).
NOTE: Telex copies of draft statement will be forwarded by MCA's A. Clark to management contacts (Allied - W. S. Ferguson) for review and endorsement. MCA will then present to OSHA on behalf of the VCM Research Group.
2. Individual firms present were urged to wire Assistant Secretary of Labor Stender advising him of the economic consequences of the NIOSH recommendations. The support of key (VCM/PVC) customers in this undertaking through their issuance of similar wires was also recommended.

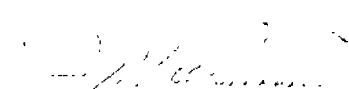
(1) Committee Chrmn.: R. Fleming - Air Products
Members: Borden, Diamond-Shamrock, Uniroyal

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3. (2) Immediate involvement of the Society of the Plastics Industry will be sought to obtain prompt and effective support of PVC converters. SPI involvement will also be directed toward development of an informational program for Congressional representatives.

Lastly, independent company contacts with OSHA were advocated to provide effective industry inputs to DOL regarding current efforts and programs. (Industry/OSHA liaison contact Lou Cox)


J. M. Quinn
Director Environmental Services

JMQ/sm

cc: Mr. W. S. Ferguson

Attachment

(2) Committee Chrmn.: Ross Adams
Members: Goodyear, Diamond-Shamrock

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GENERAL INFORMATION PRESENTED

1. B. F. Goodrich average worker exposure level for all plants now approximates 15 PPM with less than 1% of worker population exposed to greater than 50 PPM. Preliminary personal monitoring results have been in the 25-30 PPM range. Most of the BFG data has been derived from use of the portable Century organic vapor analyzer (results include H-C background compounds present). Three Bendix Analyzers have been installed at BFG's Avon Lake (1) and Louisville (2) plants. Each of these units provides a continuous read-out of ambient VCM concentrations from six (6) stationary sample points. A high reading from one of the six stationary points is area "spot-checked" utilizing the portable Century unit. The stationary units are interlocked to sound an alarm at 30 PPM. Immediate respirator use is required at the 30 PPM level with building evacuation required at 70 PPM. NOTE: BFG reports canister masks operate without break-through for one-hour in an atmosphere containing 100 PPM VCM.
2. Union Carbide, Diamond-Shamrock, Hooker and Stauffer expressed support for a "livable" TWA standard of 50 PPM. Typical ambient VCM concentrations in polymer operating areas were described as:

TWA (8 hr.) - 5 min. - 30 max. PPM
Excursions beyond 50 PPM are encountered infrequently due to leaks, etc.
3. BFG reported liver dysfunction in new applicants (Louisville area) approximates 40% of personnel interviewed (SMA-12 blood test).
4. Formal comments have been submitted to NIOSH/OSHA by Air Products, UCC, Firestone, Conoco, Shell, Dow, BFG, Monsanto.
5. BFG reported total labor force involved in PVC/VCM manufacture and related is as follows: (extrapolated from A. D. Little)

Labor Force

PVC/VCM Manufacture	14,000
Compounders and Processors	51,000
Users (Auto, Refrigeration)	842,000

6. Epidemiological report (Tabershaw-Cooper) will issue April 15, 1974.
7. Mr. Vitone presented data from the work of Prof. Maltoni reflecting the % incidence of tumors vs. exposure time. In summary, the probability of cancer incidence approaches zero (0) at concentrations of VCM in the 50-100 PPM range (95% confidence limits). (Statistics based on animal (rats) studies.)
8. Assistant Secretary Stender inspected Dow and UCC plants in Texas on 3/16/74.

Dow - VCM Freeport, Texas
UCC - PVC Texas City, Texas

Mr. Stender has requested a tour through a PVC conversion plant within the next several days (Firestone volunteered to conduct Mr. Stender through their Pottstown, Pa. facility).

9. Mr. Clark advised the VCM Research Group members in attendance that other companies now wished to support the research effort. Those seeking to participate are not producers but rather consumers (60 MM lbs/year). Member representatives concurred in accepting new firms of this type at the minimum fee of \$2700.