

bcc: Joe Odom



Air Products and Chemicals
INC.

CHEMICALS GROUP
MANUFACTURING DIVISION

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30 April 1974

Mr. Richard D. Graeser
U. S. Department of Labor
Office of Occupational Safety and Health
2809 Art Museum Drive
Jacksonville, Fla. 32207

Dear Mr. Graeser:

Mr. Joe Odom passed along your note and newspaper clipping that made reference to the 50 ppm vinyl chloride standard. We are staying very closely in touch with this problem and have several people involved full time to keep us current on regulations and making improvements to achieve minimum levels. We are spending considerable time, money, and effort to comply with regulations and to reduce the vinyl chloride concentration to minimum possible levels.

Thank you for your interest.

Sincerely yours,

A. K. McMillan

AKM:fls

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Air Products and Chemicals

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INTEROFFICE
MEMORANDUM

Date 19 April 1974

Subject Ad Hoc VCM and PVC Group/SPI

16 April, 1974

To T. L. Carey

Valley Forge

(Location, Organization, or Department)

From J. T. Barr

Valley Forge

(Location, Organization, or Department)

cc: A. R. Adams
R. Fleming (2)
J. T. Sebastianelli
W. H. Smith
E. M. Spurlock

2 Pinner
R. J. O.

The writer and Mr. Adams attended a meeting of most of the VCM/PVC producers at the Washington Hilton Hotel 16 April 1974. This was held under the sponsorship of SPI and was an effort to organize an industry-wide group to act on the VCM problem. Mr. Vittone of BFG served as chairman.

The purpose of the group was given as:

- 1) A unified spokesman for the industry.
- 2) Obtain and submit data to appropriate agencies.
- 3) Obtain reasonable standards.
- 4) Protect workers and customers from possible hazards.

Mr. J. H. Heckman of the law firm of Keller and Heckman, advisors to SPI, stated that Mr. O'Neil of OSHA had told him that OSHA will re-evaluate the new evidence and will not move hastily. It will recognize that industry has acted responsibly. MCA is investigating the availability of equipment for and cost of all studies at lower levels with larger numbers of animals. They are conducting an IBM research as to the proper sample size. Lassiter of OSHA is reported as considering the possibility of two sets of permanent standards, one for VCM operations, and one for PVC.

Mr. Vittone read off a list of personnel monitoring results from the Avon Lake plant operators, most of which were below 10, and the highest 21 ppm, for a 4-hr. TWA, using carbon tubes. The resin handling and compounding personnel were all at or below 1 ppm. Other companies reported similar, but not quite as low, results. There were 9 companies monitoring with the carbon tube method, 5 by air bags.

Mr. Ray McClure, OSHA Compliance Officer, was quoted as stating that the OSHA test method will be to use a 30 min. pump sampler for 10-20 minutes "at a point specified by the company to be below 50 ppm."

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Mr. Al Rose, Associate Assistant Secretary of Labor, was quoted as giving serious thought to a new temporary standard, and Mr. Stender was quoted as saying the permanent standard will be zero. Doubt was expressed by some of those present that industry can influence the permanent standard, because we now have no no-effect level in animals.

It was pointed out that OSHA is required to meet a substantial evidence test, and also show the feasibility of any proposed standard.

Dow stated that they have been below 50 TWA for many years, and are below 10 now, but that there have been definite measurable exposures, and they have no cases.

Union Carbide supported their position, saying that in their 40 years of experience there had been several high exposures, but only one past case, and none at present. There are 9 plants with over 20 years operating history.

Goodrich admitted to a past probable TWA of "150-200", and in view of present data, would have expected some cases, and could use this to explain past cases and lay a foundation for arguing a safe level (Note: I feel that this is treacherous ground.).

Goodyear was asked about the exposure history of their cases, and in a later telephone call to me confirmed that all were long-term employees, contrary to the statement made at the EPA meeting two weeks earlier. They admitted to very high exposures in the past.

Mr. Vittone repeated that they can further reduce exposure, given time, but cannot attain zero. A poll was taken of how many thought they could attain various ceiling levels with the following result: below 10, none; 20, one; 30, five or six; 40, four; 50, several. About 8 persons said that their plants could reach 5-10 TWA in time, this time being something in excess of 12 months. It was pointed out that an 8-hr. TWA of 5 would permit a 1-hr. exposure of 40, or a quarter-hour exposure of 160, and thus could well not be acceptable.

There was a general consensus that the group should push for a TWA, not a ceiling, standard, and that this was good toxicology.

Several stated that requiring workers to spend all day in respirators was not acceptable. Goodrich said that they supply canisters which are worn while in the range of 50-200. Above this the workers leave or wear respirators. They supply a loose-fitting PVC suit for wet work, and a disposable paper suit for dry work.

Others supported the position that a 5-10 ppm final standard would require substantial expenditures, process changes, and time. (There seemed to me to be a disturbing tendency on the part of Vittone to lead the discussion into the area of accepting a 5-10 ppm standard.)

A committee was appointed, chaired by H. Connors, Diamond, and made up of about 8 persons whose names I did not get, with the charge of preparing an industry-sponsored position paper. Their instructions were to emphasize:

- 1) Industrial exposure and health data.
- 2) A desire for a step-wise standard.

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- 3) New animal work to be done to support the final level of (2) above.
- 4) A definite TWA, not a ceiling or non-detectable level.
- 5) Definition of methods of detection.
- 6) A statement on fabricators and their situation, and the VCM content of PVC.

Participating companies were urged to present supporting data to this committee.

The SPI was given permission to speak for the group, without prior editing, in public relations matters, particularly in their weekly news letters.

Legal opinion was given that, so long as there was no suppression of evidence or technology, the group could organize to make proposals and speak for the industry.

It was stated that ORC was also working on the problem, especially in the area of supervising a program at Georgetown University to do mortality studies of fabricator employees.

Participating companies reserved the right to withdraw if they could not support the final presentation.

A Steering Committee was appointed with power to act in emergencies, made up of: A. Vittone; A. R. Adams; J. Fath, Tenneco; Connors, Diamond; and J. Williams, Dow. The chairmanship will rotate among the members.

Various persons again stated the monomer content of resin, and pointed out that there was no evidence of health problems in fabrications. It is hoped to convince OSHA that there is no need to look further than PVC production. Several companies are working with customers to obtain data during processing and will pool this data.

The FDA situation was discussed, and it was predicted that prior sanction will be revoked, with an interim standard of 1 ppm residual VCM for flexibles and 10 ppm for rigids. A method sensitive to 50 ppb will be published with none detectable being allowed in the product. Chronic toxicity studies will be done when a feeding method is found, and a final standard will be issued based on the findings. The FDA is not permitted by law to allow a known carcinogen to be present in foods. The SPI is handling liason on this subject. (It may be that the old Airco feeding studies with 400-series resins could be useful here. We can estimate the VCM content of those resins.)

This new standard is expected in 2-3 weeks, after which there will be a 30-60 day period for comment. Pertinent data are desired by SPI and FDA. The various governmental agencies are under considerable pressure from unions and public interest groups, and are very sensitive to looking bad.

It was decided that assessments for expenses will be on the same basis as at NCA, the published capacity.

Ross Adams was appointed head of a committee to be named by him, and authorized to engage A. D. Little to do an economic impact study, if it can be obtained on a timely basis.

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The National Bureau of Standards has been asked by OSHA to prepare environmental, and perhaps economic, impact statements. NBS has asked for help, but caution was advised in that industry may wish to object to the final statement.

The forthcoming CBS documentary was mentioned, and it was recommended that those asked to participate do so. SPI will provide advice on techniques for interviewing.

The advisability of contacting legislators was questioned by F. Rozak, but persons in the audience felt it was advisable, providing the position of the person was understood.



J. T. Barr

JTB:mb

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