

March 7, 1986

R. A. Guyton, M.D.

Subject: Environmental Health/Industrial Hygiene/Toxicology
Activity Report - February, 1986

1. A few minor problems have been discovered in the MSDS report. Mrs. Dillon has outlined these with examples and Battelle has been notified by letter. One problem has to do with the number of lines programmed into the report. Because of the line limit data is dropped when the report is printed. These problems are not regarded as serious but nevertheless will have to be corrected before we start routinely sending data sheets to the plants. Hopefully, this will be solved during the next month. An interesting aside - Battelle in their quarterly user report announced a "significant new development" and referred to a new BASIS capability of creating a material safety data sheet which complies with OSHA regulations. This happens to be BFG's report.
2. A BFG tire center employee was hospitalized for carbon monoxide poisoning. He was found lying in the parking lot outside the Main Exchange Building. Since there was no industrial hygienist with Tire Group and due to the obvious serious exposure Mr. Katzenmeyer investigated this incident. Sampling equipment was borrowed from GenCorp. Dangerous levels of carbon monoxide were found in the leased tire storage area (Main & Exchange Center) where the man worked. This occurred because of the operation of a propane-powered lift truck in an area with restricted ventilation. In my view this could just as easily have been a fatality.
3. BASIS was used this month to respond to a call from a hospital in Indiana. They had a patient who had splashed a BFG adhesive in his eye. We were able to quickly respond with acute toxicity and first aid information to the hospital's satisfaction. Additionally, we responded to a New York hospital emergency room regarding a patient who had ingested a BFG product. This call was referred to Mr. Katzenmeyer's home late Sunday evening.
4. In response to the recent court ruling allowing the Akron right-to-know ordinance we have begun to input the necessary information into BASIS to assist the Akron facilities in complying with this law. Existing records for Chemical Plant 3 have been reviewed and notation made for RTK applications.
5. We have been notified that the EPA is preparing a CHIP (Chemical Hazard Information Profile) on Cure-rite 18. With the assistance of The SP&C business group Dr. Hinderer has assembled a detailed package covering physical chemical properties, workplace and consumer exposure, environmental fate, and human and environmental effects. This is a very important project because of the attention rubber chemicals are receiving by the EPA (i.e. test rules). Fortunately, we have developed a considerable amount of data.

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In the future, Dr. Hinderer plans to review information deficiencies with the product group. Hopefully, if we can complete the development of a minimal database, we will be able to avoid an expensive test rule on CR-18.

6. The long-awaited FDA proposal confirming the safety of PVC for food contact applications was published in the February 3, 1986 Federal Register. At the same time, FDA also published the agency's withdrawal of its 1975 proposal which would have prohibited the use of rigid and semirigid PVC food contact articles.

In general, the proposal has been well written, containing no surprises. The proposal would amend 16 different existing food additive regulations by specifying residual RVCM levels. In addition, it would establish two new regulations, one for rigid and semirigid PVC food contact articles and one recognizing the prior sanctioned uses of PVC and vinyl chloride copolymers.

Utilizing the constituents policy and ultraconservative risk assessment, the FDA has set a limit of 5 ppb RVCM for flexible PVC, 10 ppb for rigid and semirigid, 50 ppb for pipe and 50 ppb for vinyl chloride copolymers. The Chemical Group feels that these are achievable levels for most products.

Mr. Bachtel found that one prior sanction for BFG was not included. This prior sanction by virtue of 1954 and 1956 letters from the USDA is for the use of polyblend resins (a mixture of PVC and acrylonitrile/butadiene resins) in conveyor belts in contact with meat and poultry products. This is a significant business for Chemical and Fabricated Polymers.

Mr. Bachtel has discussed the FDA proposal with Fabricated Polymers and has met with Chemical several times to explore BFG's options. We have agreed to support the industry comments through SPI, however, we will comment ourselves on BFG's prior sanction.

Once this proposal is finalized, it will open the door again for PVC liquor bottles which should be a significant business for BFG.

7. Mr. Bachtel wrote a comparison of the regulatory and toxicology status of 1,1,1-trichloroethane, ethylene dichloride and methylene chloride. This information is to be used by the Carbopol sales group to try to counteract our competitors' claims of safer nonbenzene Carbopol-type resins.

He again reminded the Carbopol sales group of the published Cosmetic Ingredient Review Experts Panel's article reviewing the Carbomer (Carbopol) resins. The Expert Panel concluded the Carbomers are safe for their current uses. It is evident from this article that only the benzene produced Carbopols were reviewed. It was again stressed that this article is not being utilized to its fullest advantage. We believe all current and potential customers should be provided a copy of the article.

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8. Good-rite 3126 is being considered as a replacement for BHT in many applications. Migration studies of 3126 utilizing food simulating solvents have been completed. After a written report is received, we can proceed with the FDA petitioning process.

New samples of polyether polyurethane resins have been prepared for migration studies. This was necessary due to a change in Belgie's needs. The new samples contain higher levels of some components as well as new components.

9. Dr. Hinderer assisted the FPD in preparing a preliminary information package for submittal to the EPA. Following this activity we met with the EPA to determine the requirements for pesticide registration of four Promac products. The FPD has asked that every effort be made to expedite testing. As a result, Dr. Hinderer has requested the necessary protocols which will be hand delivered to him next week at the SOT annual meeting.
10. The Estane business group is continuing to pursue potable water pipe clearances through a joint project with Shell and Insitu Form. Earlier this month we met with representatives of Shell and the N.Y. State Department of Health and Dr. Hinderer reviewed the limited toxicological data on Estane polyethers with them. No estimate was given as to when we might have a response. However, Shell is taking the lead role and will keep us informed.
11. Dr. Hinderer met with the SP&C Group to assist them in prioritizing research to find alternatives to benzene as a solvent for Carbopol. Additional toxicity information review was requested on several solvents.
12. Dr. Hinderer has prepared a draft submission for compliance with the TOSCA 8d health and safety reporting rule for vinyl acetate. This draft has been submitted to the Geon Company for their review.
13. Ciba-Geigy requested that BFG transfer our current food additive petition for expanded use of Good-rite 3125 to them. The request was made so that Ciba-Geigy would be in closer contact with FDA on the petition. A letter was sent to the FDA requesting transfer of the petition to Ciba-Geigy. As a result BFG will no longer be involved with this petition. It will be Ciba-Geigy's responsibility to see it to completion.
14. The Hytox database grew to 303 records. Input of new records (89) nearly doubled from previous months. We continue to streamline and improve the production process within the department in an attempt to minimize errors, avoid duplication and increase productivity. Changes and additions to existing records will now be done once per week and work has been organized so that all the changes in a single record can be done once.

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15. The annual mortality reports for each location are being generated and will be completed this week. Review and analysis will probably take 30-45 days.
16. Audiograms received from ETC for employees at the Bloomington Plant were transcribed to BFG forms and entered into the MSS.
17. We continue assisting Larry Brinkley with entering Hazard Communication Training into employees' individual job exposure histories.
18. Letters were sent to 104 eligible participants in the Urine Cytology Program. 56 responses have been received to date. Letters were also sent to the Avon Lake, Cleveland and Brecksville dispensaries notifying them of active employees at their locations who were to be offered the test.


Harold W. Dietz

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