

Interoffice Memorandum

TO (Name and Location)	DATE
Dr. R. W. Godwin and Mr. R. E. Cromer	May 21, 1979
FROM (Name and Location)	REFERENCE NO
J. C. Pullen - Charlotte	JCP-79-108

CONFIDENTIAL

PLAINTIFF'S
EXHIBIT
CEL-962

SUBJECT: Dissemination of Test Information

We are receiving more and more "alerts" on various chemicals, and at the present time have no policy for dissemination of such chemical/health test information to employees. Each situation has been handled on a case-by-case basis, and generally we have chosen not to make "formal" announcements to hourly personnel with the recent exceptions for benzene and methylene chloride.

The Chemical Company is taking a more open position, and is communicating to employees all such information, whether the test conclusions are from extensive epidemiological and/or animal tests, or from simple screening tests. A recent example was mutagenic screening for methanol; the Ames test was negative while the mouse lymphoma test was positive. Here, the Chemical Company conveyed these results to all its employees (attached).

In discussions with the Celriver and Amcelle industrial hygiene coordinators (Benjock and McLain), we have concluded that CFC should not routinely communicate "suspect" information based on screening tests. If such an alert is received, we recommend that the following actions be taken:

- 1) Conduct area and dosimeter testing to assure no employees are being exposed in excess of OSHA limits,
- 2) Determine if engineering controls can be devised to significantly reduce exposures,
- 3) Determine if a substitute chemical can be substituted.

If an alert is received based on good "hard" human and/or animal testing (as judged by Dr. Clary), then formal communications should be made to affected employees. These communications should be coordinated through Jim Allen, and involve the plants, the CFC Industrial Hygienist and Dr. Clary. The three actions above should also be completed as soon as possible.

In the case where an employee requests information on a "suspect" material, a back-up statement should be prepared for use by the plant supervisors. This statement should emphasize that data is inconclusive and will be verified or refuted by further, more refined, testing. It should also be emphasized that exposures are being monitored and controlled below appropriate limits.

Could we discuss this problem with the objective of developing a CFC policy?

J. C. Pullen
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cc: Mr. J. P. Allen - Charlotte
Mr. L. H. Knox - "

HNA 24843