



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
FABRICS & FINISHES DEPARTMENT

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Wilmington, Delaware
March 20, 1974

File
FWH
MJA

T. R. MATTHEWS

NPCA OCCUPATIONAL HEALTH TASK FORCE

Re: Washington meeting 3/19/74

1. OSHA Oversight Hearings (Select Committee on Labor -
House Committee on Labor)

NPCA has requested permission to participate in the proceedings and has been told that Hearings may continue over the next 6-8 months. No date for their appearance has been set, but Task Force members have been asked to provide input for the planned statement. Subject to Legal Department approval, we should consider offering input in the following areas of concern:

- a. Section 5 (a) of the Act provided for the arbitrary adoption of consensus standards for a period of two years (period expired April, 1973) with the understanding that such standards would be modified promptly to insure consistency and eliminate requirements not directly applicable to worker health and safety. DOL has done an exceptionally poor job in modification (e.g., storage of flammable material requirements that emphasize protection of property rather than workers; unrealistic air contaminant restrictions on amorphous silica, etc.). Industry has a right to expect that DOL will comply with their Congressional charge.
- b. In the development of new standards or proposed standards, we perceive a lack of expertise. The technique most often used, involves the re-interpretation of well known information by newly established "experts" (e.g., ACGIH threshold limit values have been halved by NIOSH in several recent proposals.)
- c. New standards should specify the problems to be solved and permit industry to search for innovative solutions

with a minimum of restraint. In those cases where sampling and subsequent analysis are involved, the methods by which performance will be measured, must be clearly defined and publicized, but allowance must also be made for equivalent methods.

2. Vinyl Chloride Monomer

The Painters and Allied Trades letter to their National Health and Safety Committee (copy attached) charged that polyvinyl chloride causes cancer and that painters have been effected. In a related meeting between Task Force members and Dr. Irving J. Selikoff, it was learned that Mt. Sinai Hospital is undertaking a "vast research program" to define the VCM problem and that the paint industry will be involved. (Selikoff is reported to have a grant from NIOSH to conduct a seminar on VCM and PVC in August.) Selikoff suggested that the paint industry cooperate in the study "with a sense of urgency" and supply him with the following information:

- a. History and current usage of PVC-containing paint formulations by year and quantity plus end use information.
- b. The number of employees per year who could have been involved in the production of PVC-containing coatings.
- c. Medical examinations of employees to determine if they display symptoms of any of the occupational diseases associated with exposure to VCM.
- d. In-plant monitoring to determine likely exposures to production personnel. In addition, exposures should be determined for various application techniques such as use in an enclosed room, if such usage could reasonably be anticipated.

The Task Force proposed that members supply preliminary information on items (a) and (b), in confidence, to R. W. Murry. After review of the total figures, a recommendation will probably be made to the Community Services Steering Committee and the Executive Committee, to cooperate in Selikoff's study. (We apparently have little choice, other than in the extent of cooperation. However, Selikoff is certain to want medical records in a search for "leading indicators of harm" such as non-alcoholic cirrhosis of the liver.)

Murry will also contact the MCA study group for VCM with a request for data on monomer content in commercial resins and information on analytical techniques. Note that FPG stated they have been getting monomer content from their supplier(s) on each batch of resin purchased.

3. DOT Regulations - HM-102

Though not specifically related to the Task Force assignment, Bruce Hamill stated that NPCA will petition DOT for an extension in the enforcement date of HM-102. One of the bases for the request will be that the requirement to display actual flash points on certain products in transportation, is new material not mentioned in the proposed regulations; due process has been denied.

4. NIOSH Trade Name Survey

There has been no response from NIOSH to NPCA's request for a meeting to discuss the paint industry's problems with the survey form. When received, we will be asked to participate with SW and PPG representatives.

F. T. JOHNSON

FTJ:mlb
Attachment

B.P.S. to H. H. Kohl: Is there any indication from Safety & Fire as to Corporate participation in the OSHA oversight hearing?

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