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CRITERIA FOR MEDICAL SURVEILLANCE OF VINYL CHLORIDE DAMAGE A BLOCKBUSTER:

OSHA published its temporary emergency standard of 50 ppm for worker exposure to vinyl chloride in the Federal Register of April 5--but a better behind-the-scenes story can be found in the NIOSH recommendations for medical surveillance of workers dealing with VC. The recommendations were not included in the temporary emergency standard but presumably will be considered by OSHA in its permanent standard.

The recommendations for medical surveillance go considerably beyond anything NIOSH has proposed to date, with the possible exception of the carcinogen surveillance, and reflect the pressures which the Government now feels on the subject of vinyl chloride.

Among other things, it recommends that "no woman who is pregnant or who expects to become pregnant should be employed directly in vinyl chloride monomer operations."

The recommendations for medical surveillance include all persons engaged in vinyl chloride monomer production and polymerization, including personnel peripherally involved such as in clerical and management assignments. Screening priority should be given to current employees with prolonged and close potential exposure to vinyl chloride monomer, whether in present or past work settings. Here are the NIOSH recommendations:

- * At time of initial employment or upon institution of screening, a physical examination shall be performed with specific attention to detecting enlargement of the liver or spleen by abdominal palpation.

- * At time of initial employment, or upon institution of screening and annually thereafter, a medical history check-list shall be completed by the employee, covering alcohol intake; past history of hepatitis; past exposure to potential hepatotoxic agents, including drugs and chemicals; past history of blood transfusions; past history of hospitalization.

- * At time of initial employment, or upon institution of screening, a serum specimen shall be obtained for screening with respect to the following five biochemical determinations of liver function: total bilirubin; alkaline phosphatase, SGOT, SGPT, GGTP.

- * Additional tests that may optionally be considered for use in screening include LDH, serum protein determinations, serum protein electrophoresis and platelet count. Laboratory analyses shall be performed in labs accredited by the College of American Pathologists or licensed in accordance with the provisions of the Clinical Laboratories Improvement Act of 1967.

- * If results of laboratory screening are normal, screening shall be repeated on an annual basis. If the person being screened has been employed directly in vinyl chloride monomer production or polymerization for ten years or longer, screening shall be repeated every six months.

- * If one or more liver function tests are abnormal, serum testing shall be repeated as soon as possible,

preferably within two to four weeks. If no abnormalities are present upon rescreening, testing should be repeated in three months.

* If abnormalities persist on rescreening, the employee shall be removed from contact with vinyl chloride monomer operations and an individualized medical workup shall be instituted. Suggested as initial steps in medical workup are a complete physical examination and various screening procedures such as hepatitis B antigen determination and liver scanning.

"If liver function abnormalities are determined to be unrelated to liver disease (e.g., elevated alkaline phosphatase in a young, physically active man or elevated bilirubin in Gilbert's syndrome) or to be transient (e.g., due to recent hepatitis or recent alcohol intake), the employee may be permitted to return to vinyl chloride-related employment, subject to individual medical evaluation," the NIOSH recommendations stated.

The temporary emergency standard published by OSHA reviewed the history and symptoms of angiosarcoma and the hazards resulting from exposure and called for monitoring of workers and the air. Whenever any monitoring sample reveals vinyl chloride at a concentration in excess of 50 ppm, all employees exposed shall be withdrawn to a safe area.

Note: Vinyl chloride and polyvinyl chloride are the hottest topics in town. The Food and Drug Administration said it is reviewing data to determine whether leaching is occurring which would warrant action on consumer products. The Environmental Protection Agency has formed an internal task force headed by Glenn E. Schweitzer, Director of EPA's Office of Toxic Substances, to assess the over-all environmental impact of VC and PVC in terms of air, water, pesticides and other areas under its jurisdiction. Thus, the battle is now Government-wide.

AMERICAN CAN CO. SIGNS VOLUNTARY COMPLIANCE AGREEMENT ON NOISE:

The American Can Co. has signed the first national compliance agreement with the Labor Department under OSHA to reduce employee exposure to noise at 83 container plants by December 1, 1975.

The company has committed its resources to develop feasible engineering and administrative controls at two engineering centers and to implement such controls as soon as they are developed and proved feasible. Meanwhile, American Can will continue to provide and insure use of personal protective equipment, including the use of ear plugs and muffs.

The negotiations leading to the compliance agreement followed citations for "other than serious violations" by OSHA inspectors against American Can, alleging noise violations at plants in Newnan, Ga., Detroit and North Kansas City, Mo. The citations were contested by the company and are now pending before the Occupational Safety and Health Review Commission.

Under the new agreement, the pending cases before the Review Commission involving the three plants will be settled. The agreement applies to all American Can container manufacturing facilities in the United States. The agreement is subject to the approval of an administrative law judge of the Commission and to review by the three-member Commission itself before it becomes final.

In the agreement, American Can commits itself to furnishing OSHA and making available to the unions listed in the agreement periodic reports detailing the company's progress in developing engineering and administrative controls. OSHA reserves the right to continue inspecting company facilities for all conditions covered by the law.

Six international unions whose affiliates represent employees of American Can plants have concurred in the agreement between the company and OSHA. They are: Graphic Arts International Union; International Association of Machinists and Aerospace Workers; International Brotherhood of Electrical Workers; International Brotherhood of Teamsters; United Paperworkers International Union; United Steelworkers of America. Union participation was coordinated by the AFL-CIO Standing Committee on Occupational Safety and Health.

Note: A study conducted for OSHA by Bolt, Beranek & Newman estimates that maximum compliance with the current 90 dBA standard for occupational noise exposure will cost industry \$1.728 billion in the first year of a three-year effort, rising from \$175 million in the first quarter. Expenditures in the third year would reach \$7.259 billion (in 1973 dollars). A less stringent five-year compliance plan would require a first-year expenditure of \$809 million; in the fifth year, an investment of \$4.314 billion would be required.

"If everything else (including profits) remains unaffected and the economy is producing at full capacity, these costs, which do not contribute to capacity or productivity increases, would displace planned investments," it says. "The resulting decrease in the rate of capital accumulation, however, could conceivably produce



INTER-OFFICE CORRESPONDENCE

To: Mr. J. A. Clapperton

Date: April 15, 1974

From: Zeb G. Bell, Jr.

Location: 19 East

Subject: Women Working in
VCM Operations

The attached Occupational Health and Safety Letter is supplied for your information. Please note that NIOSH recommended that no woman who is pregnant or who expects to become pregnant should be employed directly in VCM operations.

There are some women in the research laboratories, although they may not be working with VCM. The plant personnel department should adopt a position as described above.

I do not know what effect this has on the EEO program.


Zeb G. Bell, Jr.

ZGB:mal

Attachment

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