

INTEROFFICE MEMORANDUM

Date: 06-Jan-1994 09:32am CST
From: Verne L. Rhodes
RHODES, VERNE L.
Dept: MCCENV
Tel No: 314-694-2575 FAX 694 6262

TO: Laudtke, Al

(PAPER MAIL)

Subject: CRI Technical Program

Al:

The following is my working document on the results of the Executive Committee meeting of January 4, 1994:

Problem:

My conclusions after meeting with Tom Iversen:

1. We have new leadership on the executive committee level that wishes to cut costs and maintain "mill control".
2. MLB is actually recommending that we back away from the next EPA workshop and the Executive Committee is willing to accept this recommendation. This is an unacceptable position.
3. We have a consensus problem between the tox (technical) committee and the Science Advisory Board on what research we need to do.

Discussion:

There is great frustration among the members of the executive committee (EC). They feel that they have spent over \$1 million on the issue and that there is no end in sight. The EC strongly wishes to move carpet out of the spotlight and into its real role as a minor component of the indoor air quality issue. This should be the objective of our strategy.

Early in the EC meeting, the proposal for an industry wide complaint handling system was brought before the group. Legal advised that this system would make the work of the plaintiffs easier in the class action suits. Several members felt strongly that handling complaints WAS NOT an appropriate roll of the CRI. They did not want to surrender the decision making power to clean or remove carpet. The decision was made that CRI should only collect data that the mills would input.

The proposed EPA workshop was discussed and legal apparently pointed out the hazards associated with this meeting. Without any PR or government affairs input, the decision was made to back away from the

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...They feel that any additional action only weakens
...position in the class action suits.

They seem to not be sensitive to the political and public relations issues. Also, their memory is very short on how much mileage they have gotten out of the technical work to date. (Anderson's testimony in the Amara case would have been FAR more significant without Dudek's participation.)

When CRI was called to defend the industry in front of the congressional committee on June 11, 1993, the major reasons that we came away feeling that we were NOT going to be subjected to a lot of bad publicity and unnecessary regulation were:

- . We had been working hand in hand with EPA for several years in an open, pro-active, responsible manner. (Carpet Policy Dialogue Group, Green Label Program, etc.)

- . We had existing creditable, on-going research programs targeted at finding a problem if one existed.

- . We made certain commitments to continue on this course of action. Included in these commitments was the promise (to Synar) to spend up to \$10 million to "put to rest" this issue!

EPA and the congressional committee are under the impression that we are committed to doing specific things. These things include:

- Investigation of complaints, ON SITE.

- Providing additional data on the nature and number of complaints we receive.

- Looking for problems among carpet industry workers or installers.

- Additional research on health effects of chemicals that are emitted from carpet.

- A continuing program of VOC reduction.

- Participation in meetings with complaintants and their physicians looking for the reason that these people say they are sick.

- Provide information as to the chemical composition of carpet. There is of course, some room for negotiations in these commitments but we do not have the option of declaring victory and telling EPA to look for problems elsewhere.

workshop.

VLR Comment and opinion:

The lawyers are advising as to how to win the law suits; both current and anticipated. They feel that any additional action only weakens their position in the class action suits.

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- a. Investigation of complaints, ON SITE.
- b. Providing additional data on the nature and number of complaints we receive.
- c. Looking for problems among carpet industry workers or installers.
- d. Additional research on health effects of chemicals that are emitted from carpet.
- e. A continuing program of VOC reduction.
- f. Participation in meetings with complaintants and their physicians looking for the reason that these people say they are sick.
- g. Provide information as to the chemical composition of carpet. There is of course, some room for negotiations in these commitments but we do not have the option of declaring victory and telling EPA to go look for problems elsewhere.

With respect to the apparent disagreement between the Technical Committee and the SAB, there was a document from Mike Phillips which strongly urged human health work in place of the sensory irritation work. The fact that we have some disagreement should not be surprising. The technical committee is made up of industry specialists with a strong toxicological / analytical chemistry background. This committee tends to look toward this type of science for safety assessment data. The SAB was selected from a broader scientific base.

The study and testing methods Phillips is recommending may be worthy of additional consideration but we must be very careful not to test our products by unproven methods.

Iversen's current position:

Tom feels that he needs the following for the next Executive Committee meeting (currently scheduled for February 15, 1994):

1. List of Promises we have made to EPA
 - a. What do they think is our obligation?
 - b. What do we recommend?
2. What is going to happen if we don't follow through?
3. Get our house in order technically; what research do we want to do? How can we get EPA on board?
4. Have we gotten the most mileage out of work already done? Should we have a PR program? Should we communicate with Congress?

Tom emphasized that the message from the Executive Committee is "How do we, in the most cost effective manner, get carpet out of the spotlight and back to being a part (small part) of the indoor air pollution issue?".

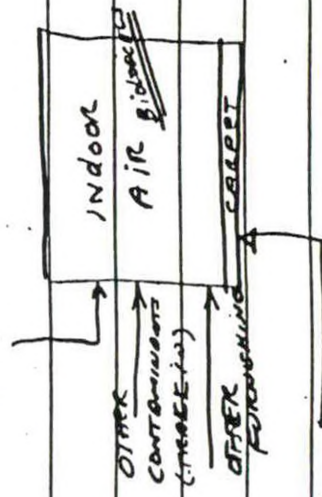
I am to give Tom an update on these issues on January 24, 1994. I currently have strong commitments on January 13 and 14 and a weaker one on 25th and 26th. Otherwise, I am available to help where I can.

As we discussed, the current EC position is unacceptable and we must find a way to move them back to a pro-active position. We really need to get our act together prior to the EPA meeting on January 19th.

I look forward to hearing from you or Werner.

Best regards,

Verne



INDOOR AIR - SAMPLE & ANALYSIS : NEW CARPET

OVER TIME

Concerns - we don't know how to put the room "to rest".

review of complaints - on site (How
do?)

additional data - on complaints

looking for problems among industry
workers / installers - What are
points?

Additional research on health effects of
emissions from carpet.

continuing provision of VOC reduction.

participation in meeting with physicians
perch risk on clean carpet.

Notes on CRT
workshop.

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- better understanding of the complaints -
- how views of physicians involved in diagnosis & treatment of individual who REPORT carpet related illness.
- identify and discuss information research needs

To support an assessment of a potential relationship between carpet & indoor air concerns

- obtain public comment on the essential components of an industry sponsored carpet research program aimed at improving understanding of the relationship between carpet emissions and health effects.

carpet emissions

:

Health Effects

carpet emissions

:

indoor air concerns