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JUN 9 1988

Local 2050

MANAGEMENT PLAN: CARPET CRISIS

This is a draft plan for investigating and mitigating the "carpet crisis" at EPA Headquarters. It is sent to you for review and comment either because you are a member of the professionals' Union, or a bargaining unit member who has volunteered to help in such situations, or are otherwise interested in the problem.

National Federation of Federal Employees Local 2050, representing EPA Headquarters professionals, has a dual role in this matter. First, as a local union, it is responsible for enforcing the collective bargaining agreement on clean air policy on behalf of employees. Second, as the organization of the Civil Service that deals with the Nation's environmental health, it has a responsibility to the people of the Nation to identify and solve a significant environmental health problem, which happens to be affecting EPA too.

With this background in mind, please bend your best professional talents to this draft plan, criticize it, and come to a seminar on it at which a final version will be developed. The seminar is set for 1:30 pm., Tuesday, June 21 in WIC Conference Room #2, The Union will then submit the plan to Lee Thomas, the Hill, the Blueprint for the Environment Coalition and the press.

If you have ever complained that "EPA never can get anything done to help employees", or "management rarely listens to us professionals when really big problems come up", then now is the time to make a change. Management is unlikely for many reasons to ignore us professionals in this matter, with a plan developed in this way.

GENERAL APPROACH: Identify the source of employee illness. Focus first on carpet because of coincidence of installation of a particular purchase lot with onset of illness, but continue to explore all facets of the problem. Determine the cause of illness and mitigate the damages suffered by EPA employees. Determine what action is required in the EPA Headquarters situation and what action is required to deal with the same or similar problems across the country.

Information Needs

Carpet-Related

1. Determine manufacturer, lot numbers or other identifiers, dates and locations of manufacture, materials

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and methods of construction, unit amounts of each material of construction.

2. Determine how butadiene-styrene latex is used and applied, how the latex is received from supplier, how and where stored--in all vessels and pipes between carpet production line and receiving facility. What analytical data on the latex are obtained? Are latex shipments blended before use? How many different shipments of latex can be stored/are stored in segregated storage? How many rolls of carpet are manufactured from a single shipment of latex? What are the quality controls on manufactured carpet?

3. Determine who the suppliers of this latex are, whether their processes are continuous, batch, etc., what quality control and analytical work is done, what other by-products are formed, whether complaints of odor (or some other 4-PC marker) have been received, whether any process changes have been instituted since ca. 1980.

* See what role TSCA section 8(c) can play re: complaints. Other uses of SB latex should be investigated, as should worker exposure to 4-PC. A study of the SB latex process by ETD could shed light on other possible by-products, remedial technology, possible section 6 or section 7 regulatory options, etc.

4. Determine when and where each roll of carpet was laid, what other materials were brought into the work space at the same time as the carpet and left behind with the carpet, e.g. adhesives.

* We will want to correlate onset of symptoms with location and time of carpet installation. We will also want to determine the air exchange rate in each location during the period following carpet installation and up to the onset of symptoms. The latter information, coupled with VOC/4-PC off-gas rate, 4-PC level in the carpet, and mass of carpet laid, will allow an estimate of VOC/4-PC concentrations in workspaces during the periods in question. This could provide valuable effect-level information.

4-Phenylcyclohexene

1. Physical-Chemical Properties: Need standard information plus rate of isomerization, thermodynamic and analytical parameters.

2. Toxicity: Acute and chronic pulmonary effects; effects on immune system; reproductive and developmental effects; neurotoxicity, sensitization, synergy with other VOCs found. Parallel testing of 1-PC may be warranted, given

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isomerization potential of 4-PC. Section 4 test rule development may be appropriate.

* OTS's Structure-Activity Team should review 4-PC for additional possible testing recommendations.

3. Use the Comprehensive Assessment Information Rule to determine the extent of 4-PC by-production in SB latex industry and whether industry has been or is doing something about it.

4. Consider toxicity testing of the suspect carpet itself, e.g. maze studies, pulmonary function tests, etc.

Medical

1. A complete and comprehensive survey/epidemiology study of Waterside Mall/Fairchild/Crystal workers is needed. Work should begin with the 7-10 most seriously affected employees, continue through other affected employees and all remaining. We must look for location and time correlations between onset of symptoms and renovation work.

2. On-going medical surveillance of all HQ employees should be maintained for the foreseeable future. Record exposure to 4-PC and other "new carpet" chemicals in each employee's personnel file.

Air-Quality

1. Obtain all records relating to air quality of affected work areas during the periods in question and for control periods.

2. Run controlled experiments to determine actual air-exchange rate for given damper settings. Try to obtain damper setting records for periods in question.

3. Run tracer gas studies of all air handling systems, concentrating first on those serving areas slated for renovation.

Extent of the Problem

Private Sector Contacts

1. In general, use TSCA resources to identify groups such as the Building Owners and Managers Assoc. who may have records of such problems, what was done about them, who the carpet manufacturers were, etc.

2. Contact CMA, CSMA, SOCMA carpet trade associations, labor unions. These contacts could lead to a cooperative,

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national plan to mitigate the problem.

Government Contacts

1. Work closely with CPSC re: extent of complaints and records available from them.
2. State and local health officials (via SARA lists?) may have records of complaints.

Employee Rights

1. All employees forced to leave a work station because of poor air quality should be placed on administrative leave until they can safely return or until they can be provided an adequate, safe and acceptable alternative work station.
2. All employees who have been charged sick or annual leave because of air quality problems should have their leave restored. All employees who have lost pay and/or incurred medical expenses because of air quality problems should be reimbursed for those expenses.
3. Employees hypersensitized by air quality should be afforded all possible active assistance by EPA in exercising options to go on permanent disability, sue for damages, or any combination of these. Employees made less severely ill should be similarly afforded active assistance in receiving all benefits to which they are entitled.
4. No employee should be required to remain in a work station that has been carpeted with the suspect carpet. No reprisal of any kind should be taken against an employee electing to leave such an area. Any manager who intimidates or otherwise threatens in any way an employee into staying in such an area should be given a thirty day suspension without pay; repeat of the offense should bring about the manager's termination.

Bill Hirzy, President
National Federation of Federal Employees
Local 2050

PROTECTION BEGINS at home, 567 Environmental Protection Agency employees say, petitioning the EPA to provide healthier air in agency buildings. Better ventilation and removal of new carpeting that they say made many workers sick head their list. The EPA says it will study the "sick building syndrome" problems. 8/17/88

Wall Street Journal,
Aug. 16, 1988