

LAW OFFICES
RUCKELSHAUS, BEVERIDGE, FAIRBANKS & DIAMOND
ONE FARRAGUT SQUARE SOUTH
WASHINGTON, D.C. 20006

WILLIAM D. RUCKELSHAUS
ALBERT J. BEVERIDGE, III
RICHARD M. FAIRBANKS, III
HENRY L. DIAMOND
GARY H. BAISE
ROBERT S. TIGNOR
KEVIN M. FOLEY
A. JAMES BARNES
HAROLD HIMMELMAN

TELEPHONE
(202) 638-7800

CARL EARDLEY
LEONARD GARMENT
OF COUNSEL

CABLE ADDRESS
"INDLAW"

October 6, 1975

Jerome H. Heckman, Esq.
1150 17th Street, N.W.
Washington, D.C.

Dear Jerry:

This letter will update you concerning the latest activities regarding the proposed EPA Vinyl Chloride Standard.

Schedule

The SPI Technical Subcommittee met with Don Goodwin and his staff in Raleigh-Durham, North Carolina on September 17, 1975. At that time, Mr. Goodwin advised that the proposed Standard should be ready for publication in the Federal Register by October 15, 1975; however, he noted his earlier prediction was that a Standard would be proposed by Labor Day. My estimate is the October 15th date will also slide.

The Proposed Standard

As you know EPA circulated a draft of the proposed Standard for intra-agency review in August. At the same time we were furnished a copy, and it has been reviewed by the SPI Technical Committee. The Committee had a number of problems with the draft and requested a meeting with Don Goodwin and his staff on September 17th. The two major issues were the application of Test Method #106 and the record keeping requirements. Goodwin and his staff seemed receptive to the Committee's arguments, and it appears some headway was made on both issues.

Legislation

The Senate has a draft bill which amends Section 112. The language would allow the Administrator of EPA to set equipment or design standards for hazardous pollutants and it,

SPI-24523

RUCKELSHAUS, BEVERIDGE, FAIRBANKS & DIAMOND

Jerome Heckman, Esq.

Page two

October 6, 1975

also seems to imply that costs may be taken into account. This would, of course, give the Agency support for what it is doing in our case.

As soon as there is some action taken by either EPA or the Congress, I will let you know immediately.

Sincerely,

William D. Ruckelshaus

William D. Ruckelshaus

SPI-24524