

PVC SAFETY GROUP

STEERING COMMITTEE

Tuesday, February 28, 1978
8:30 A.M.

The Sheraton Hopkins Hotel
Cleveland, OHIO

I. EPA Activities

Status of Proposed VC Amendments
Cancer Policy Review

- . Hearing (March 23)
- . Other industry response
(MCA, AIHC, SOCMA, SPI
Toxicity Committee)
- . Enforcement Manual

II. Committee Activities

- . Health Committee
- . Communications Committee
- . PVC Fire Safety Committee
- . Nominating Committee

Financial Report

III. Risk-Benefit Concepts

Open discussion including comments
by Professor Richard Wilson

IV. Other Business

V. Next Meeting of the Steering Committee

VI. Adjournment

March 23

**The Society of the
Plastics Industry, Inc.**

355 Lexington Avenue
New York, New York 10017
(212) 573 9400

March 10, 1978

TO: THE PVC SAFETY GROUP

Gentlemen:

Please note as indicated in the Minutes of the PVC Steering and Communications Committees, it is planned that the PVC Safety Group will take part in the EPA meeting scheduled for March 23 at the EPA offices, Waterside Mall, 410 M. Street, S.W. Washington, D.C. Room 3906 at 8:30 A.M.

It would be advisable to have a representative from your company attend this meeting if at all possible. You can expect that a draft of the presentation material will be sent to your attention about March 20.

Very truly yours,



John R. Lawrence
Technical Director

JRL:gm

SPI-08649

2/24/78

Proposed Work Plan for the SPI Presentation
at the EPA March 23 Hearing on Generic
Regulation of Carcinogenic Air Pollutants

I. Overall Approach

EPA has announced that it intends in its March 23 hearing to solicit recommendations leading to possible development of a proposed generic cancer policy for airborne carcinogens. It may be desirable simply to put EPA on notice that SPI intends to be heard forcefully on EPA's cancer policy, address the eight questions EPA posed in its amendment, and then raise the literally dozens of questions posed by EDF's petition. We should indicate that the Agency needs far more time and additional meetings before it could possibly consider proposing any new scheme.

II. Committee Work Needed Before March 23.

A. Policy Considerations

1. Whether to seek a delay of the March 23 hearing or to press for prompt EPA action because EPA's current policy is acceptable.
2. Development of an approach to EDF's proposal for a classification scheme for airborne carcinogens; consider how to distinguish EPA concerns from OSHA.
3. Coordinate approach of the AIHC proposal with prior industry position at EPA.
4. How to challenge EDF's presentation of the "Vinyl Chloride Story." How to treat EDF's statistics and such issues as substitutes, threshold, zero emissions, extrapolation of animal data to humans, replication, and offset.

SPI-08650

B. Technical and Health

By March 10, 1978, SPI should have papers prepared analyzing the EDF proposal in detail (statement by statement), raise all of the questions necessary to challenge that proposal, and consider an appropriate answer or alternative to the EDF proposal. Among the overriding issues are:

1. To what degree and in what manner should EDF cancer statistics be challenged?
2. What information is available to rebut, correct, supplement the studies relied upon by EDF?
3. What position should be taken with regard to EDF's non-threshold and zero emission theories?
4. What implications are there to the off-set policy?
5. What assumptions/facts does EDF rely upon which are erroneous?
6. What is wrong with EDF's proposed regulatory scheme both theoretically and, assuming implementation, from a practical standpoint?

C. Legal

The Legal Committee should complete by March 10 a review of the legal questions which are posed by the EDF petition. Among the issues are:

1. What is the interrelationship of EPA's authority under the Clean Air Act and the Toxic Substances Control Act, the Federal Insecticide, Fungicide and Rodenticide Act, the Federal Water Pollution Control Act and related laws and regulations?

2. Can EDF's scheme of relying on Section 111 to regulate new sources of Category II substances be effectuated?
3. What procedural safeguards are necessary under any regulatory scheme?

III. Presentation at Hearing

- A. Background. Establish setting for the hearing; identify the key parties; establish SPI stature, experience and standing.
- B. Present policy statement, consistent with overall approach outlined above.
- C. Consider having technical, medical, scientific and legal experts available to testify.
- D. Consider submission of key policy, factual and legal issues and questions raised by EDF petition and the prospect of EPA action.
- E. Call for further informal meetings before decision on whether to even propose regulations.
- F. Establish groundrules if regulations are proposed, such as right of cross-examination.

IV. Other Issues

- A. Consider filing a Freedom of Information Act request to obtain (a) all EPA cancer policy documents which led to its May 1976, statement, and (2) any new information the Agency has received on this subject relevant to the EDF proposal.
- B. Establish procedures for liaison with AIHC.
- C. Schedule of meetings.
- D. Establishment of committees and selection of chairpersons.
- E. Coordination of expert witnesses with AIHC.
 1. Oral presentation.
 2. Written submission.

SPI-PVC & VCM PRODUCERS GROUP
SOURCE & DISPOSITION OF FUNDS
AS OF 12-31-77

SOURCE:

AMOUNT

1. <u>Carryover (Loss) From 1976/77 Operations-Per</u>			
Ledger Print-Out			\$(28784.58)
Plus: Duplicate Entry of Allied Chem. Payment			(2460.00)
Less: Assessments Paid-Not Recorded on Ledger			
Great American Chemical			912.00
Hooker Chemical			<u>167.50</u>
Net (Loss) Carryover from 1976-1977			\$(30165.08)
2. <u>Assessments:</u>	<u>Total</u>	<u>Assmt.</u>	<u>Net Assmt.</u>
	<u>Assmt.</u>	<u>Paid</u>	<u>Due</u>
a. 1976/77 Assessment No.3	\$100000.00	\$100000.00	\$ -
b. 1977/78 Assessment No.1	250000.00	244512.50	5487.50
c. 1977/78 Assessment No.2	394100.00	-	394100.00
Total Assessment Income		<u>\$344512.50</u>	<u>344512.50</u>
Net Assessments Receivable Per			\$399587.50
Attached Detail			399587.50
3. <u>Meeting Income:</u>			380.00
Total Funds Available - 12-31-77			<u>\$714314.92</u>

DISPOSITION:

1. <u>Current Year Expenses:</u>			
Legal Expense - Paid thru 12-31-77	\$204711.76		
- Accrued for December	<u>12366.80</u>		\$217078.56
Public Relations Expense-Paid thru			
12-31-77	\$ 95076.52		
-Accrued for December	<u>10756.73</u>		105833.25
Meeting Expense (Incl. Travel)			6777.92
Research & Development Expense			33018.67
Office Supplies & Expense			896.47
Telephone & Telegraph Expense			<u>1502.45</u>
Total Expense thru 12-31-77			\$365107.32
Net Funds Available at 12-31-77			<u>\$349207.60</u>