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Date July 22, 1976
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Answering letter date *Resin P.P.I.*
 Subject PPI - VCM Meeting -
Chicago, July 21, 1976

Copy to

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The subject meeting was a meeting of the PPI DeFacto VCM Group with invited guests from the SPI VCM-PVC Producer's Group. The purpose was to allow discussion on RVCM in potable water pipe.

Prior to the meeting, PPI had queried PVC producers relative to 1) Their willingness to live with a maximum level of 10 ppm RVCM in resin for potable water pipe and, 2) Would they be willing to subject themselves to routine sampling and testing of their resin to ascertain compliance to a maximum 10 ppm RVCM level in their resin sold for potable water pipe use.

In attendance at the meeting were 16 resin producers including UCC plus interested parties such as NSF, Unibell, and SPI legal counsel.

Out of the total 16 producers only UCC took a position that maximum 10 ppm RVCM was not acceptable -- in fact, they all said positively they could live with such a level. However, they all stated, including UCC, that routine sampling and testing of their resin was unacceptable; some more positive than others. All further stated that the final testing should be done on the piping system in order to monitor 10 ppm maximum RVCM in the system.

While several specific motions were made that ultimately will be published, I will try to summarize the sense of the meeting.

For background, it will be recalled that in September, 1975, FDA issued a proposed regulation on PVC used for food contact in which, among other things, potable water was included. They deferred imposing this regulation on potable water until further data was gathered and submitted to FDA. Normally where food is concerned, the FDA is forced to employ measures including the "Delaney Clause" which states that

UCC
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July 22, 1976

anything contacting food which contains any amount (no matter how small) of a known carcinogen can be ruled out. Heckman, legal counsel to SPI, has taken the tack that by law water systems and water quality is in the province of EPA and has been somewhat successful in moving the whole subject away from FDA to EPA. Chances are reasonably good that this will eventually happen perhaps by 1977, but key to this move is the "self-policing" posture of the plastic pipe as manifested in the NSF program to date.

Against this background, it is significant that the group formulated several concepts for further consideration by the PPI Board and Unibell Board. The program now is to charge the NSF Task Group on VCM to work out the mechanics of the program, i.e. statistical sampling, definition of lot size, test frequency, and methods and report this to PPI and Unibell.

The concepts formulated are:

1. Pipe and fittings are to be monitored for RVCM to ensure protection of the public health.
2. Some third party, such as NSF or other independent laboratory, will collect and test samples periodically to verify compliance with the maximum 10 ppm RVCM in the piping system.
3. Pipe and fitting producers can choose one of several routes to monitor RVCM.
 - a. Monitor resin, or get certification from the producer or seller.
 - b. Monitor the compound from which products are made, or secure certification from the producer or seller.
 - c. Monitor the pipe and fittings alone.

The above are to be done with a statistical, reliable control method which will assure no more than 10 ppm RVCM in the fabricated article.

4. Since resin producers will provide test data on a "lot" basis, to their customers no inspection of resin producing plants is contemplated. However, the independent third party will take a sample of resin or compound from the pipe or fitting fabricator during their routine inspection and sampling visit.
5. The pipe or fitting producer must keep accurate records of testing and results on all product monitored whether it be resin, compound, or pipe and fittings.

The total system for inspection, monitoring, testing, etc. including frequencies, methods, etc. will probably be adopted by EPA as their standard for protecting the public water supplies from contamination

UCC
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July 22, 1976

by PVC pipe. Much work is yet to be done in defining the procedures but it behooves UCC if we want to supply the pipe market, to devise an inspection, sampling, and testing methodology to ensure that we are totally controlling the RVCM in shipments we make for potable water pipe and fitting fabrication.* The level may be 10 ppm maximum to some accounts and higher to others depending upon how the producer chooses to monitor and control RVCM. Our guess is that it will largely be 10 ppm maximum.

We recommend work on the control and certification problems be commenced as soon as possible with a target for completion by mid-fourth quarter.

There are probably a number of questions brought to mind by the foregoing recitation. I'll be happy to answer these as they arise.

Carl
G. C. Shipston

GCS/def

*Attached proposal by B. F. Goodrich was not acted upon but the procedures outlined in Part I are worth studying.