



A Division of The Society of The Plastics Industry, Inc.

VIA FACSIMILE

(Total # of Pages Being Sent: 9)

December 10, 1993

TO: Ron McCree
EDC/VCM/PVC Quality Team-Distribution

RE: VI Letter to EPA Administrator - IMPORTANT

PLEASE REVIEW AND PROVIDE COMPANY RESPONSE BY CLOSE OF
BUSINESS, FRIDAY DECEMBER 17

At the Vinyl Institute Executive Board meeting on December 8, the Board voted to forward the VI-funded ChemRisk report "Critique of Dioxin Factories" to EPA Administrator Carol Browner in response to the April 23, 1993 submission of the "Dioxin Factories..." report to Browner by Greenpeace. This vote overrides the recommendation of the EDC/VCM/PVC Quality Team developed during the November 3 conference call.

I have been asked to recirculate to the EDC/VCM/PVC Quality Team the letter developed by Peter de la Cruz of Keller and Heckman that you previously reviewed along with the referenced August 18 press release.

Please review this letter within your company and respond with any suggested changes you may have by close of business Friday, December 17. Should a teleconference be required to further discuss, you will be notified. Thanks, in advance, for your attention to this matter.

Meredith

Meredith N. Scheck
Assistant Director

Distribution: (see attached)

R&S 143454

Carol Browner
Administrator (A-100)
United States Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Greenpeace Study of the Polyvinyl Chloride Industry

Dear Ms. Browner:

The Vinyl Institute, a division of The Society of the Plastics Industry, Inc., represents the majority of polyvinyl chloride (PVC) and vinyl chloride monomer (VCM) manufacturers in the United States. We recently learned of an April 23, 1993, letter sent to you by Greenpeace International. The Greenpeace letter alleges that environmental problems are being created by the release of dioxins and other organochlorines from the production of polyvinyl chloride. We wish to correct certain misleading and unsupported assertions in the Greenpeace document "Dioxin Factories: A Study of the Creation and Discharge of Dioxins and Other Organochlorines from the Production of PVC," which was sent to you.

Because accurate information about the PVC industry and the potential health risks associated with PVC manufacturing is necessary to make sound regulatory decisions, the Vinyl Institute commissioned an independent study of the Greenpeace report. The ChemRisk study details numerous factual errors and unsupported allegations in the Greenpeace report and provides accurate information about the PVC industry.

In addition to the ChemRisk study, we also enclose an August 18, 1993, press release from the Norsk Hydro Plant in Rafnes, Norway, revealing the results of an exhaustive study of dioxin emissions during the manufacture of vinyl chloride at that plant. The 1993 Norsk Hydro study calls into question the very data cited in the Greenpeace report, and shows that actual emissions from the Norsk Hydro plant in Norway are far lower than the those cited by Greenpeace.

The vigilance of the U.S. Environmental Protection Agency together with concerted efforts by U.S. PVC manufacturers have made the United States' PVC manufacturing industry one of the safest and cleanest in the world. We are proud of the progress we have made over the last two decades. PVC production is an essentially closed process which serves as a leader in emissions reduction and waste minimization. Existing U.S. EPA and state

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regulations govern the release of vinyl chloride to the air, water and soils, impose stringent controls on workplace exposure to vinyl chloride, and require the installation of advanced pollution control equipment at vinyl chloride and PVC manufacturing facilities.

The Greenpeace report is dangerously misleading because it's conclusions are based on several incorrect fundamental assumptions. Greenpeace asserts that the PVC industry is a "major new dioxin source" and implies that the dioxin produced by the PVC industry will add significantly to dioxin in the environment. Greenpeace wrongly assumes that because large amounts of chlorine are used in PVC production, large amounts of dioxin necessarily are produced as wastes. Greenpeace's conclusions are based on three fundamental, but flawed, assumptions.

(1) Greenpeace assumes that analytical data from a single vinyl chloride monomer (VCM) facility are representative of data from all VCM/PVC facilities. Much of the Greenpeace report is based on analytical data from a single vinyl chloride manufacturing facility: the Norsk Hydro plant in Rafnes, Norway. Greenpeace extrapolates data from a 1989 survey of dioxin emissions from this plant and applies the data to the entire universe of PVC manufacturing facilities. The 1989 data from the Norsk Hydro plant is not characteristic of industry-wide emissions on a global scale because production processes and emissions control technology differ materially at individual facilities. Greenpeace ignores the emissions control technology and regulatory emissions limitations on all vinyl chloride and PVC facilities in the United States.

(2) Greenpeace assumes that vinyl chloride facilities in heavily industrial areas necessarily were the source of dioxin found in environmental media in those areas. Greenpeace utilizes analytical data from several "case studies" showing the presence of dioxins in environmental media in regions near vinyl chloride facilities to conclude that the vinyl chloride facilities were the source of the dioxins. This conclusion is implausible because it ignores the countless other sources of dioxins in the industrial areas where the samples were taken. Greenpeace's inaccurate reporting of facts (including misstating the location of a vinyl chloride facility) and mischaracterization of the studies' results further undermines Greenpeace's conclusions.

(3) Greenpeace assumes that clinical studies showing an association between chemical worker exposure and increased mortality prove that dioxin caused the increased mortality. Greenpeace mischaracterizes the results of clinical studies of the health risks of dioxins. Greenpeace prematurely concludes that dioxin is a human carcinogen based on evidence from clinical studies that demonstrate an association between chemical worker

exposure and increased mortality. Greenpeace's conclusion is fundamentally flawed because none of the cited studies concluded that dioxin was the cause of the increased mortality. Indeed, recent evidence suggests that ~~the~~ dioxin likely is not a human carcinogen at the low doses found in environmental exposures.

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Responsive to the Clean Air Act Amendments of 1990, EPA is reviewing the vinyl chloride standard and ensuring that maximum achievable control technology (MACT) is required. Current Agency rulemakings, together with continued industry commitment to environmentally responsible manufacturing, will provide ample protection against potential health threats. The fundamental flaws in the Greenpeace report cast doubt on its credibility and obviate the need for additional Agency action.

The Vinyl Institute and the industry it represents remain committed to working with the Agency to provide essential PVC consumer products in an efficient, environmentally safe manner. We welcome your questions and look forward to continued cooperation in the future.

Sincerely,

Attachments

- 1 - ChemRisk, "Critique of 'Dioxin Factories'" (Sept. 1, 1993).
- 2 - Press Release, Norsk Hydro, Rafnes, Norway (Aug. 18, 1993).