



Conoco Chemicals Company

Conoco Inc.
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November 18, 1980

RECEIVED DEC 1 1980

John Lawrence
The Society of Plastics Industries, Inc.
355 Lexington Avenue
New York, NY 10017

SUBJECT: CONTINGENCY PLAN FOR CLEAN WATER ACT

Dear John:

Attached is Conoco's Contribution to the contingency program recently initiated by SPI. The attached plan covers two areas of the Clean Water Act most likely to impact Plastics operations in the future, i.e. effluent guidelines and water quality criteria.

Very truly yours,


Joseph C. Ledvina, Director
Environmental Activities

ajo

Attachment

cc H. R. Flammer

SPI- 12298

CONOCO

ALTERNATIVES SUBCOMMITTEE PLAN
FOR CLEAN WATER ACT

- PURPOSE: To identify responses to potential actions by EPA regarding regulation of vinyl chloride and/or PVC manufacture under the Clean Water Act.
- SITUATION:
1. EPA is developing effluent guideline documents under Sections 301, 304, and 307 of the CWA on industry-by-industry basis.
 2. Water quality criteria have been proposed by vinyl chloride.
 3. Chemicals and Plastics effluent guidelines are scheduled for proposal in June, 1981.
 4. Effluent guidelines will specify Best Available Technology (BAT), Best Conventional Technology (BCT), New Source Performance Standards (NSPS), and Pretreatment Standards for Publically Owned Treatment Works (POWs).
- WHAT IF:
1. Effluent guideline document sets allowable VCM levels in effluents unrealistically low.
 2. Proposed water quality criteria are used to write water quality limited permits.
- TRACKING:
1. Effluent Guidelines -- Keep in contact with Effluent Guidelines division for latest timing. Discuss with other trade associations such as CMA and SOCMA.
 2. Water Quality Criteria -- Monitor Federal Register. Discuss with other trade associations. Membership companies should alert others if water quality criteria is used in their permit negotiations.
- TRIGGERS:
1. Proposal of Effluent Guidelines.
 2. Water Quality Criteria used to write permits.
- CONTINGENCY PLAN:
1. Effluent Guidelines
 - a. Mobilize membership for compilation of relevent data to support comments on proposed guidelines.
 - b. Compare guidelines to actual effluent levels of vinyl chloride.
 - c. Consider judicial review.
 2. Water Quality Criteria -- Consider judicial review.

SPI- 12299

December 5, 1980

TO: KELLER AND HECKMAN

FROM: R. P. BECKER
DIAMOND SHAMROCK

SPI/PVC SAFETY GROUP
ALTERNATIVES COMMITTEE
DRAFT CONTINGENCY PLAN FOR OSHA

PURPOSE: To identify potential responses to future OSHA regulatory activity impacting on VCM/PVC.

SITUATION: OSHA promulgates and enforces regulations addressing worker exposure to chemical substances in the workplace. Several areas where OSHA may impact our industry are:

- (A) VCM Revisions
- (B) PVC Respirable Dust Regulations
- (C) Labelling
- (D) Generic Cancer Policy - Candidate List
- (E) EDC Regulations
- (F) Regulation of PVC Additives

(A) VCM Revisions

- (1) Up-date of VCM mortality study by CMA will cover all deaths from 1973 through 1979 and work will be under way in early 1981.
- (2) Organize action by the PVC Safety Group to contact agency, discuss status and take appropriate action.
- (3) Lobbying activities by companies, SPI, CMA, and other groups.
- (4) Challenge basis for revision by keying on the lack of need supported by worker health records. Use Maltoni data and latest information on angiosarcoma world-wide. Utilize SPI's lawyer and health committees.
- (5) Wait for policy statements from the Reagan administration.

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(B) PVC Respirable Dust Regulations

- (1) Organize action by the PVC Safety Group. Confirm or deny health hazard and recommend appropriate action.
- (2) Make certain that all segments of the PVC industry reduce dust exposure. Each producer should advise their customers (see Addendum A for potential letter draft).
- (3) Accept regulation if proposed but make prior in-put before any decisions are reached.

(C) Labelling

- (1) Follow response by CMA. Will need compromise for the protection of proprietary information.
- (2) Lobby with OSHA.
- (3) Pursue SPI comments.
- (4) Since a universal approach is being taken to labelling, we should enlist support of other groups, i.e., food, rubber, specialty products.
- (5) Wait for policy statements by Reagan administration.

(D) Generic Cancer Policy - Candidate List

- (1) Become familiar with CMA response. Also, solicit more individual companies to respond.
- (2) Lobby with OSHA.
- (3) Challenge and/or confirm health hazard through the use of outside professional experts.
- (4) Enlist support of other groups due to universal nature of problem.
- (5) Wait for policy statements from Reagan administration.

(E) EDC Regulations

SPI- 12301

- (1) Lobby with OSHA.
- (2) Enlist support from other chemical companies and from CMA.
- (3) An Ad Hoc group within SPI has prepared for action on EDC and this group should maintain a state of readiness.
- (4) Wait for further identification from Reagan administration.

(F) Regulation of PVC Additives

- (1) Worker exposure to lead is an example of an effective regulation that may serve as a useful model in other areas.
- (2) Build a library of information on such areas as heavy metals, phthalates, etc. so that we are prepared with facts if and when regulations are eminent.