

NOV 13 1974

TO F. X. Ritter AT Piscataway DATE NOV. 11, 1974
FROM H. B. Carr AT " COPY TO W. P. Anderson
D. I. Smalley
SUBJECT VCM-EPA

Reference: Draft Copy of EPA's Analysis of
Air Pollution Regulatory Alternatives
for Vinyl Chloride

The referenced EPA draft report represents a serious threat to the PVC industry and should be challenged by whatever legal means that are available to us.

Two principle points emerge:

1. As Ken Johnson indicates in his cover memo, EPA places major emphasis upon the inferences they draw from the reported cases of angiosarcoma among both those with presumed low levels of occupational exposure and those living in the neighborhood of VCM/PVC plants.

On page 2, such an inference is clearly drawn regarding the two reported cases of angiosarcoma among individuals who lived for many years near industrial sources of VCM; namely, "However the pathology seen in these two cases was not identical in all respects to the angiosarcoma of the liver seen in workers exposed to vinyl chloride and, thus, there is some question whether these cancers were induced by inhalation of vinyl chloride. Even with these uncertainties, however, these cases do suggest a possible relationship between community exposure to vinyl chloride and liver angiosarcoma".

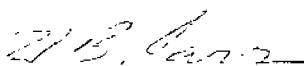
This inference is threaded throughout the report.

2. The report examines regulatory alternatives under the 1970 Clean Air Act. Based on inferences cited in item 1, the most stringent alternative is recommended (Section 112). EPA's reasons (page 49 f):

- a) VCM, even on limited available ambient data, is a hazardous pollutant.
- b) Another alternative (Section 111) would require EPA to consider cost and also variances could be granted.
- c) Section 111 is an untried tool and unforeseeable delays could result.
- d) Section 112 allows EPA to set equipment standards. In other words, set a level and tell industry how to get there!

F. X. Ritter
VCM-EPA
Page 2

On 11/8/74, I called Nick Wheeler of Union Carbide who stated that the report has been referred to his legal department. W. P. Anderson will report separately on his contact with Bob Laundrie of General Tire and other contacts.



H. B. Carr

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