

The economic implications are significant when we consider jobs for downstream fabricators, transporters, distributors, and recyclers of PVC construction products (installers are included in the 350,000 number above). It is estimated that 75% of PVC products are used in construction applications, including drinking water pipes and fittings, energy-efficient windows, roofing, wall covering, flooring, and fire-resistant wires and cables. All of these products are important to expanding U.S. inventory of new homes and also are widely used in renovating existing homes.

Thus, it would be unfortunate in the extreme if the HON rule and its technically infeasible requirements were to cause disruptions in facility operations, threaten supply chains for products vital to our economy and our national security, at a time when we are looking to expand domestic manufacturing and economic activity. Nor would these adverse effects be limited to the construction industry. As Figure 1 below indicates, PVC and its raw materials inputs are important components in the chlor-alkali supply chain. Disruptions in these downstream raw material inputs will reverberate back throughout that chain with broader implications for the national economy.

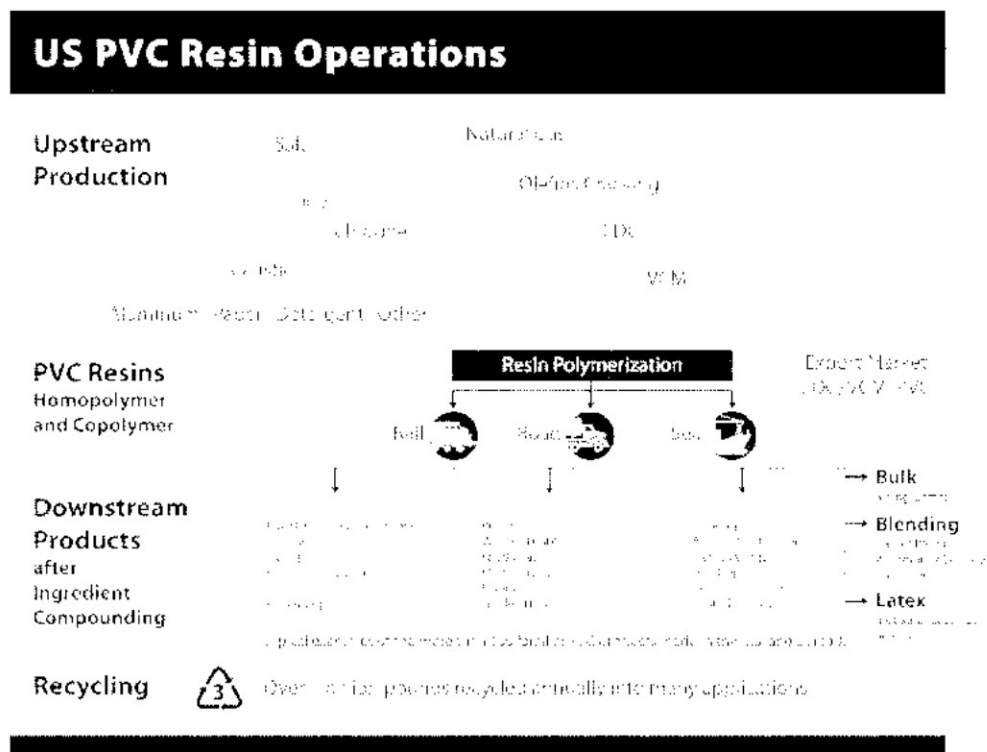


Figure 1: PVC Industry Role in the Chlor-Alkali Supply Chain

Such disruptions are also unnecessary, as far as VI members that produce PVC are concerned, as those facilities have been subject to and are operating under D/F limits since 2012.¹⁷ Indeed,

¹⁷ *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers (PVC) Production*, 77 Fed. Reg. 22,848 (April 17, 2012).