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Post-it™ Fax Note 7671		Date 9-27-94	# of pages 1
To Ron McCreedy		From F Krause	
Co/Dept		Co.	
Phone #		Phone #	
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Fred E. Krause
Director - Environmental Solutions

September 26, 1994

Mr. Hans Vahlenkamp
Product Stewardship Services Manager
BASF Corporation
3000 Continental Drive-North
Mount Olive, New Jersey 07828-1234

Dear Hans:

Thank you for volunteering to co-chair our Plasticizer Task Group with Lou Maresca-Geon. As I noted in the VI Technical Meeting, a number of incidents show more attention to plasticizer not necessarily related to the cancer endpoint:

- 1) Swedish Eco Cycle Report (in attached package)
- 2) Greenpeace Press Release re Eco Cycle Report
- 3) Meeting with EPA Canada and Vinyls Group/SPI that Bob Burnett and I attended recently.
(Number of questions; i.e. plasticizers and EPA Canada placed DEHP on "Toxics to Health" list.)
- 4) FDA contacts at Geon re concern on plasticizers in Blisterpack (transfer to medication).
Key Point: Looking at plasticizers
- 5) Cleo Colburn listing of phthalates as possible reproductive and endocrine disrupting effects; i.e. estrogen mimics. (in attached package)
- 6) Attached collection of documents pulled together and sent out to CFFA Environmental/Production Committee.

Attached are some of the documents referred to above.

Also attached is a report on actions being taken by an industry group in Europe to respond to the Eco Cycle report. Also, the contacts at FDA Office of Pre-Market Approval that D'Lane Wisner-Geon talked to are:

Tim McNeil - 202-205-4630
Elizabeth Cox - 303-418-3188
(McNeil's supervisor)

I was happy to hear the CMA Phthalate Ester Panel was already working on this issue and look forward to seeing your action plans.

Sincerely,

w/attachments



cc: Lou Maresca - Geon w/attachments
Bob Burnett - VI
Ron McCreedy -
D'Lane Wisner - Geon

R&S 143724

VINYL INSTITUTE ISSUES MANAGEMENT COMMITTEE

VI Office
65 Madison Avenue
Morristown, NJ 07960

Wednesday
September 14, 1994
8:30

ATTENDEES:

Michael Barish, Borden Chemicals and Plastics
Robert H. Burnett, Vinyl Institute
Paul Carrico, Vista Chemical
Peter de la Cruz, Keller and Heckman
Fred Krause, The Geon Company, **CHAIR**
Brad Lienhart, Chlorine Chemistry Council
Kim Mathieu, Elf Atochem
Ron McCreedy, Dow Chemical
David A. Meeker, Edward Howard & Co.
Mike Reynolds, Vista Chemical
Margaret Rogers, Dow Chemical
Greg Rutman, The Geon Company
Richard G. Ryder, Klockner Pentaplast
Fred Sacks, OxyChem
Meredith Scheck, Vinyl Institute
Al Sundberg, BASF
Theresa Termine, Nichols-Dezenhall
Martin White, Occidental Chemical

SUMMARY OF ACTION ITEMS

- | | | |
|----|------------------------|---|
| 1. | T. Termine | Develop and distribute action plan for processor plant visit and contact program for the next 3-4 month period. To be distributed with Friday report. |
| 2. | D. Meeker | To make recommendations on communication plan with employees. |
| 3. | R. Burnett | To contact ACSH regarding work product. |
| 4. | M. Barish
N. Jacobs | To work together to define matrix for eco-benefits project. |

R&S 143725

5. D. Meeker IMC endorsed concept of "futures project" for development and committee review.
6. R. McCreedy IMC recommended consideration at September 20, 1994 Technical Committee of formation of two task forces under the Technical Committee to address plasticizer and additive issues.
7. Next Meeting November 17, 11-4, Washington, DC

I OPENING OF MEETING AND SELF INTRODUCTIONS

Mr. Krause convened the meeting at 8:30 am and asked for a round of self introductions.

II APPROVAL OF MINUTES OF PREVIOUS MEETING

The minutes of the previous meeting were accepted as prepared.

III EPA DIOXIN REASSESSMENT

A. EPA Communication

Mr. Burnett stated that as previously advised he met with EPA staff on issues related to the Agency's work on its dioxin reassessment report, with this activity culminating in a letter to EPA Assistant Administrator Lynn Goldman committing the industry to characterize its emissions.

B. EPA Announcement

Mr. Krause highlighted the EPA press statements made September 13 as well as statements made by a group of environmental organizations in a joint press conference (information packets on these two press conferences were distributed).

C. Crisis Management Plan

Ms. Termine noted that Nichols Dezenhall developed a crisis management protocol which had been previously distributed to the Committee and subsequently endorsed by the Executive Board. She noted how the protocol had been implemented following the September 13 news conferences by U.S. EPA and a joint environmental briefing.

D. Grassroots

Ms. Termine updated the committee on the status of implementing the grassroots program. The committee discussed in detail the strategy of the plant visitation component as well as the utility of arranging for a Washington, DC visitation program. Ms. Rogers suggested a need to focus beyond congressional incumbents. She also highlighted some environmental legislation that could surface in the remaining days of the current congress prior to adjournment or in a special lame duck session. Following discussion, Ms. Termine was asked to develop an action plan for the grassroots program to cover the next 3-4 month period, with the action plan to be distributed in the Friday report.

Mr. Lienhart noted the database being assembled by Direct Impact under contract with the CCC.

E. Coalition Building

Ms. Termine stated that the industry needs to find ways to energize trade groups for which the vinyl industry issues are important but not necessarily front line, with the goal of such a program to keep the groups educated and in the information network. She noted that a number of trade association publications had carried news items in their newsletters concerning the chlorine issues.

Mr. Lienhart noted that CCC has been having biweekly meetings to assure that the Washington, DC based trade associations were all kept apprised of the most information.

IV VI STRATEGY AND ACTION PLAN UPDATE

A. Deal with Anti-Vinyl Legislation

Ms. Termine noted that this issue was covered in the September 7 report.

B. Communications

o Employees: Mr. Meeker noted that the industry needs to be assured that its own employees are kept updated on significant issues. He noted that the agency recommended previously that an update to the "On the Firing Line" presentations be considered with perhaps an interactive video news conference format. A round table discussion followed on: the utility of a video format at their

sites or regional sites; the target group of employees; consideration of other tools; and the goal of the program. At the conclusion of the discussion, Mr. Meeker was asked to do additional research on the topic and to report back to the group on the program recommendations, including logistics and associated costs.

o Media: Mr. Meeker noted a memo from Ms. Jacobs of Edward Howard & Co. on promoting eco-benefits issues through the media and commented that a mat feature on pipe has been developed. Mr. Meeker further noted that work is underway with the Discovery Program for the production of a segment on vinyl recycling. Mr. Meeker further noted that the agency has recently restructured the way it is looking at news coverage of vinyl issues and he asked for input on the next report.

o ACSH: Mr. Burnett noted that the ACSH paper, on which there have been five drafts, is now on hold. Mr. Lienhart noted that he had recently met with Elizabeth Whelan of the ACSH and noted the importance of educating the ACSH science contacts and Board on the issues surrounding chlorine chemistry. At the conclusion of the discussion, Mr. Burnett was asked to recontact ACSH.

o Dow Proposal: Mr. Meeker noted that the project proposed by Mr. Parry is to be an internal Dow project on which the VI will cooperate as appropriate.

o Eco-Benefits of Vinyl: Mr. Meeker updated the Committee on the status of the eco-benefits project. He noted that Ms. Jacobs has the necessary energy related data, but is having trouble getting appropriate additional information. At the conclusion of the discussion, Mr. Barish volunteered to work with Ms. Jacobs on developing a matrix of specific questions that might be helpful in generating the needed information.

o "Futures Project": Mr. Meeker noted that as follow up to previous discussions regarding the need to do more to promote the vinyl industry, he has developed a plan for the preparation of a white paper looking at the vinyl industry 25 years in the future. He outlined the scope of the project and the suggested research team. Mr. Meeker commented that the anticipated cost of \$15,000 would be covered by the existing budget. Following a brief discussion, the committee endorsed the concept as presented.

C. Dealing with the Dioxin Issue

o EDC/VCM Task Force: Mr. McCreedy summarized the activity of the EDC/VCM task force, including the data exchange meeting with the European Council of Vinyl Manufacturers and the database development through a third party. Mr. McCreedy noted that five protocols that have been under development at Wright State University will (as of Board approval on September 13) be paid for by the Vinyl Institute. Mr. McCreedy commented that one of the protocols is on a topic which requires further discussion at the September 19 task force meeting on which it might be difficult to reach industry consensus. Mr. Burnett noted that there have been no votes at the Board level on this issue. Mr. Burnett noted that from his perspective he would like to be able to share the data gathered with the EPA. On the issue of dioxin in PVC, Mr. McCreedy updated the group on additional clarifying information about the previously reported samples tested by the Swedish government as well as additional samples that have been tested in Europe at which no dioxin was found. Mr. McCreedy noted that Environment Canada had requested that information on the Swedish samples be provided.

o Incineration Task Force: Mr. Krause updated the committee on the work of the Incineration Task Force being chaired by Don Goodman of OxyChem. He noted the ASME study underway with the contracted assistance of Rigo & Rigo Associates on incineration at MSW, medical and hazardous incinerators. Mr. Burnett noted that the total contract is at the \$130,000 level, with a commitment from CCC to support \$40,000 and a request for a contribution from the American Plastics Council pending.

D. CCC Update

Mr. Lienhart noted that his successor has been selected (Kip Howlett) and noted his background. Mr. Lienhart reviewed in detail the current structure of CCC and summarized ongoing activities, including the work being undertaken in conjunction with the dioxin reassessment. He noted that the budget of \$14 million includes \$5-6 million of sponsored technical research initiatives. He distributed a chemical specific chart and asked for assistance in filling the data gaps on producers.

E. Budget/Membership

Mr. Burnett advised the Committee that the Board had been notified that the expenses for the work being done by Nichols Dezenhall would at the current rate likely exceed the budgeted amount by approximately \$66,000. The Board authorized the Executive Director to proceed and be kept apprised of the impact on the budget. Mr. Burnett also noted that with the agreement of the Board additional VI members will be sought where they meet the current bylaw membership requirements.

F. Strategy Discussion

Mr. Krause asked for a committee discussion on the appropriateness of the current strategy. Mr. Burnett noted that in conjunction with the development of the crisis management protocol Nichols Dezenhall had recommended a media specific approach to dealing with incorrect data points raised. Ms. Termine elaborated on the recommendation. She noted that it would still be useful to produce documents such as "The Truth About Vinyl" for education and use by industry representatives and coalition partners. Mr. Rutman noted that this new approach would be supplemented by the strategy developed and implemented by the Environmental Issues Task Force. There was committee agreement that this was the correct strategy. Ms. Termine also updated the group on plans to use third party spokespersons where appropriate.

V ENVIRONMENTAL ISSUES TASK FORCE

Mr. Rutman, Legal Committee and task force chair, noted that a group was formed to develop and implement an appropriate procedure to assure that VI responses to misstatements or distribution of material containing factual errors be corrected in a manner that will be the most useful to the industry for both public relations and legal defense purposes. He gave a recent example of how this procedure was used.

Mr. Rutman also highlighted recent litigation related to material safety data sheet information and noted that this might also be of interest to the HSE committee.

VI KANSAS PIPE

Mr. McCreedy highlighted the contents of the industry presentation in August to the U.S. Environmental Protection Agency by a joint Vinyl Institute - Uni-Bell PVC Association technical team on the potable water issue in Doniphan No. 5 in

Kansas, including the work done on possible remediation strategies for the agency to consider. He noted that the residents of this particular water district continue under a "no drink" order. Mr. McCreedy commented that at this time no further technical activity is anticipated.

VII COMMITTEE/TASK FORCE UPDATES

A. VIGOR

Rich Ryder, the new chair of the Vinyl Institute Group on Recycling, noted that the group is to reexamine its mission statement. He updated the group on VIGOR activities related to Habitat for Humanity, major retailers, autosort technology development and placement, and also noted that the Vinyl Siding Institute's vinyl siding collection program in North Carolina is in full implementation.

B. Technical Committee

Technical Committee chair Ron McCreedy noted that the committee has moved to a three meeting per year format with project specific activities handled by task forces which will sunset when program objectives have been achieved. He noted that task forces are currently operational on EDC/VCM emissions issues (chaired by McCreedy) and on incineration (chaired by Don Goodman/OxyChem). At the next Technical Committee meeting consideration of additional focus on fire science issues will be discussed.

C. Health, Safety & Environment Committee

Mrs. Scheck noted that the committee, which is operating on a three times a year schedule, is scheduled to meet next week. The new chair, Jim Kachtick of OxyChem, will be leading the group in a review of the committee's mission statement and objectives.

D. Packaging Issues

Ms. Mathieu updated the group on the status of the Vinyl in Packaging Awards Program, noting that plans called for the judging to be September 26 and for the awards to be distributed in conjunction Pack Expo.

E. Pipe Issues

Mr. Barish commented that coordination with Uni-Bell is continuing and noted the joint activity in the Kansas

Mr. Burnett noted that the Executive Board had approved the addition to staff of a Technical Manager and asked for any suggestions members may have on individuals with recent vinyl industry experience.

IX REVIEW ACTION ITEMS

The action items were reviewed by Mr. Krause and Mrs. Scheck and appear at the beginning of the minutes of the meeting.

X ADJOURN/NEXT MEETING

The next meeting was set for November 17, 11 am - 4 pm, Washington, DC.



Meredith N. Scheck
Assistant Director
Sept. 16, 1994 Draft

potable water issue. Mr. McCreedy noted that the presentation to the EPA by industry laid out a number of possible remediation strategies that the government could implement. At the present time, Mr. McCreedy noted that the no-drink order continues.

F. Government Affairs

Ms. Rogers reviewed how the issue of a "chlorine ban" might be addressed in the next Congress. She also updated the group on amendments to the Safe Drinking Water Act and to Superfund reauthorization. Ms. Rogers commented on the directions that should be anticipated in the EPA's next budget (for FY 96), and noted that the Administration's final environmental agenda could include revisions to several major environmental statutes that the specifics could be significantly affected by the mid-term congressional elections. She reviewed several issue themes that could be anticipated, such as pollution prevention, interest in most sensitive populations, non-cancer health effects issues, and environmental justice.

VIII NEW BUSINESS

A. Additive Issues

Mr. Krause reviewed a recent information request from the US Food and Drug Administration regarding use of plasticizer in blister pack that Mrs. Scheck is following up on. He also reviewed recent interest on additive issues (particularly organotins) in certain European countries. Ms. Mathieu noted that there is a yearly international meeting of organotin producers that Elf Atochem is hosting this year (contact at Elf is Joe Silbermann). Following discussion, it was recommended that the Technical Committee be asked to address these issues with the input and assistance of representatives of affiliate members. Mr. McCreedy noted that the item would be placed on the agenda for the September 20 meeting.

B. Other

Mr. White noted recent news coverage in Plastics News of an EPA meeting in Chicago moderated by Recycling World Consulting. Mr. Burnett noted that Ms. Huntley of the American Plastics Council had invited comments from the VI regarding the documents presented/produced at the conference. He noted that Ms. Benkner of the VI staff had sought input from the VIGOR task force and provided a set of coordinated comments to APC.