

meeting

SPI

Jan 10

F-SPI-PAC
VCM/PRC
Producers Group

PVC SAFETY GROUP
STEERING COMMITTEE

SPI Conference Room
New York, New York

Tuesday, January 10, 1978
10:30 A.M.

The tentative meeting of the Steering Committee called for December 7 is being cancelled on the basis of insufficient need to meet at that time. Please hold Tuesday, January 10, 1978 as the definite date for a meeting of the Steering Committee at the SPI office in New York City. The meeting will begin at 10:30 a.m. and adjourn at approximately 3:00 p.m. A detailed agenda will be mailed to you in due course.

In the meantime, please use the enclosed form to indicate your attendance at this meeting.

Very truly yours,

John R. Lawrence
John R. Lawrence
Technical Director

JRL:gm
Encl.

SPI-10793

agenda



R E V I S E D

PVC SAFETY GROUP

STEERING COMMITTEE

SPI Conference Room
New York, New York

Tuesday, January 10, 1978
10:30 A.M.

- I. Background
 - (a) Costle Meeting
 - (b) Proposed EDF Meeting
 - (c) Schedule - Vinyl Chloride Amendments
 - (d) Schedule - Cancer Policy Review
 - (e) Health Comments
 - (f) Legislative Overview
- II. Reproposal of Amendments to National Emission Standard for Vinyl Chloride
 - (a) Background
 - (b) Future Action
- III. Strategy
 - (a) Present Position regarding EPA Cancer Policy
 - (b) Future Options regarding EPA Cancer Policy
- IV. Enforcement Manual
 - (a) Status
 - (b) Future Action
- V. Communications Committee
 - (a) Status
 - (b) Future Actions
- VI. Financial Report
- VII. Other Business
- VIII. Next Meeting - Date and location
- IX. Adjournment - (Approximately 3 P.M.)

agenda

REVISED

SP

*F-SPI-PAC
VCM/PVC Producers Group*

PVC SAFETY GROUP

STEERING COMMITTEE

SPI Conference Room
New York, New York

Tuesday, January 10, 1978
10:30 A.M.

- I. Background
 - (a) Costle Meeting
 - (b) Proposed EDF Meeting
 - (c) Schedule - Vinyl Chloride Amendments
 - (d) Schedule - Cancer Policy Review
 - (e) Health Comments
 - (f) Legislative Overview
- II. Reproposal of Amendments to National Emission Standard for Vinyl Chloride
 - (a) Background
 - (b) Future Action
- III. Strategy
 - (a) Present Position regarding EPA Cancer Policy
 - (b) Future Options regarding EPA Cancer Policy
- IV. Enforcement Manual
 - (a) Status
 - (b) Future Action
- V. Communications Committee
 - (a) Status
 - (b) Future Actions
- VI. Financial Report
- VII. Other Business
- VIII. Next Meeting - Date and location
- IX. Adjournment - (Approximately 3 P.M.)

SPI-10795

PVC SAFETY GROUP

STEERING COMMITTEE

Tuesday, February 28, 1978
8:30 A. M.

Sheraton Hopkins Hotel
Cleveland, OHIO

SUMMARY:

- 1 - PVC Safety Group has been designated by The American Industrial Health Council (AIHC) to represent them at the EPA meeting to review its carcinogen policy on March 23. PVC Safety Group members are urged to be present.
- 2 - Nominating Committee recommends present officers of Steering Committee to serve for a second year.
- 3 - The next meeting of the full PVC Safety Group is March 31, 1978 in Arlington, Virginia.

ATTENDEES:

D. C. Nuechterlein - CHAIRMAN - Dow Chemical USA, 2020 Dow Center, Midland, MI 48640
E. G. Ackerman - Diamond Shamrock Corp., 1100 Superior Avenue, Cleveland, Ohio 44114
A. Ross Adams - Air Products & Chemicals, 400 Orchid Circle, Emmaus, Pa 18049
Gary H. Baise - Beveridge, Fairbanks & Diamond, One Farragut Square South, Wash. D.C.
J. T. Barr - Air Products & Chemicals, Box 538, Allentown, Pa 18105
R. W. Fortenbach - Shell Chemical Co., One Shell Plaza, Houston, Texas 77001
Ralph L. Harding - SPI - 355 Lexington Avenue, New York, NY 10017
Francis Hor - Firestone Plastics Co., P. O. Box 699, Pottstown, Pa 19464
Jack Jaglom - The Pantasote Co., of N.Y. 26 Jefferson Street, Passiac, NJ 07055
R. W. Laundrie - General Tire & Rubber Co., One General Street, Akron, Ohio 44329
John R. Lawrence - SPI - 355 Lexington Avenue, New York, NY 10017
William Rupp - Tenneco Chemicals, P. O. Box 365, Piscataway, NJ 08854
Dick Savage - B. F. Goodrich Chemical Div., 6100 Oak Tree Blvd., Cleveland, Ohio 44131
Steve Schaefer - Diamond Shamrock Corp., 1100 Superior Avenue, Cleveland, Ohio 44114
Don K. Spencer - Shell Chemical Co., One Shell Plaza, Houston, Texas 77001
Dale W. Sullivan - Ethyl Corp., 451 Florida Blvd., Baton Rouge, La 70801
Todd Walker - Firestone Plastics Co., Firestone Blvd., Pottstown, Pa 19464
Professor Richard Wilson - Harvard University.

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

355 Lexington Avenue • New York, N.Y. 10017

(212) 573-9400

SPI-10796

- 1 - Chairman Nuechterlein opened the meeting by calling on Messrs. Schaefer and Barr to review the results of the meeting held with the AIHC Steering Committee relative to the review of EPA's carcinogen policy. The conclusion of this meeting was that AIHC wishes the PVC Safety Group to act for AIHC at the EPA hearing scheduled for March 23. In doing this, AIHC would make available any of their background preparations that have been made for the chemical industry's response to the OSHA Generic Carcinogen proposals.
- 2 - Mr. Baise presented a Proposal Work Plan for an SPI presentation at the EPA March 23 meeting on its generic regulation of carcinogenic air pollutants. (Attachment A).

With respect to broadening the SPI comments to cover materials other than just vinyl chloride or plastics related chemicals, he suggested it would be difficult to do this adequately by March 23. Reference was made to two reports that might be cited to EPA as a basis for any changes in the EPA's carcinogen policy:

- . Principles for Evaluating Chemicals in the Environment - National Academy of Sciences, 1973
- . Decision Making for Regulating Chemicals in the Environment - National Academy of Sciences, 1975.

In discussing the policy consideration, the group reached the following decisions:

- i) Seeking a delay in the March 23 hearing would not be advisable.
- ii) The AIHC's Alternatives document can be used as a basis for critiquing the EDF proposal. However, legal counsel pointed out that there are some fine points of differences between the legislative authority of OSHA and EPA and these should be taken into account.
- iii) It will be important to coordinate the approach used in the AIHC proposal with prior industry positions at EPA.
- iv) It will only be necessary to make reference to industry's previous comments on EDF position on vinyl chloride and provide a summary of the industry's position on these points.

- 1 - Chairman Nuechterlein opened the meeting by calling on Messrs. Schaefer and Barr to review the results of the meeting held with the AIHC Steering Committee relative to the review of EPA's carcinogen policy. The conclusion of this meeting was that AIHC wishes the PVC Safety Group to act for AIHC at the EPA hearing scheduled for March 23. In doing this, AIHC would make available any of their background preparations that have been made for the chemical industry's response to the OSHA Generic Carcinogen proposals.

REDACTED

- ii) The AIHC's Alternatives document can be used as a basis for critiquing the EDF proposal. However, legal counsel pointed out that there are some fine points of differences between the legislative authority of OSHA and EPA and these should be taken into account.
- iii) It will be important to coordinate the approach used in the AIHC proposal with prior industry positions at EPA.
- iv) It will only be necessary to make reference to industry's previous comments on EDF position on vinyl chloride and provide a summary of the industry's position on these points.

SPI-10797

Nominating Committee - Dr. Adams reported that the Nominating committee recommends that Messrs. Nuechterlein, Schaefer and Walker be re-nominated to their present offices and that their respective companies be nominated to the Steering Committee for a three year term. It was agreed that these nominations should be directed to the attention of the full PVC Safety Group for action at the March 31 meeting.

Health Committee - Mr. Nuechterlein reported on behalf of Dr. Torkelson that the Health committee was still searching out an organization maintaining complete records on VC health studies and related information. It was urged that one of the several organizations under consideration be retained for a trial period of 6-12 months.

5 - EPA Hearing Plans

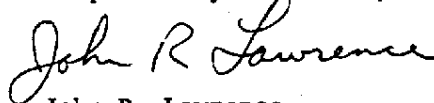
Beveridge, Fairbanks & Diamond will prepare a draft of an industry presentation to cover legal, technical and health considerations. It was agreed that we should make it clear that comments were preliminary in response to the "meeting" context rather than a "public hearing". Further, that we should reserve the right to make further comments relative to any unresolved technical considerations.

Plans were made for Messrs. Baise, Laundrie and Barr, to meet with the AIHC's Scientific Committee on March 7. Final plans for participation at the March 23 meeting are to be reviewed with the AIHC Steering Committee in Chicago on March 15. A draft of the presentation material will be sent to the full PVC Safety Group by March 20 if it is at all possible.

It is urged that all PVC Safety Group member companies try to be represented at the March 23 meeting.

- 6 - The next meeting of the Steering Committee will take place at 8:00 a.m. just prior to the meeting of the full committee on Friday, March 31, 1978.
- 7 - The meeting adjourned at 2:40 p.m.

Respectively submitted,



John R. Lawrence
Technical Director

ATTACHMENTS
3/8/78

SPI-10799

2/24/78

Proposed Work Plan for the SPI Presentation
at the EPA March 23 Hearing on Generic
Regulation of Carcinogenic Air Pollutants

I. Overall Approach

EPA has announced that it intends in its March 23 hearing to solicit recommendations leading to possible development of a proposed generic cancer policy for airborne carcinogens. It may be desirable simply to put EPA on notice that SPI intends to be heard forcefully on EPA's cancer policy, address the eight questions EPA posed in its amendment, and then raise the literally dozens of questions posed by EDF's petition. We should indicate that the Agency needs far more time and additional meetings before it could possibly consider proposing any new scheme.

II. Committee Work Needed Before March 23.

A. Policy Considerations

1. Whether to seek a delay of the March 23 hearing or to press for prompt EPA action because EPA's current policy is acceptable.
2. Development of an approach to EDF's proposal for a classification scheme for airborne carcinogens; consider how to distinguish EPA concerns from OSHA.
3. Coordinate approach of the AIHC proposal with prior industry position at EPA.
4. How to challenge EDF's presentation of the "Vinyl Chloride Story." How to treat EDF's statistics and such issues as substitutes, threshold, zero emissions, extrapolation of animal data to humans, replication, and offset.

SPI-10800

2. Can EDF's scheme of relying on Section 111 to regulate new sources of Category II substances be effectuated?
3. What procedural safeguards are necessary under any regulatory scheme?

III. Presentation at Hearing

- A. Background. Establish setting for the hearing; identify the key parties; establish SPI stature, experience and standing.
- B. Present policy statement, consistent with overall approach outlined above.
- C. Consider having technical, medical, scientific and legal experts available to testify.
- D. Consider submission of key policy, factual and legal issues and questions raised by EDF petition and the prospect of EPA action.
- E. Call for further informal meetings before decision on whether to even propose regulations.
- F. Establish groundrules if regulations are proposed, such as right of cross-examination.

IV. Other Issues

- A. Consider filing a Freedom of Information Act request to obtain (a) all EPA cancer policy documents which led to its May 1976, statement, and (2) any new information the Agency has received on this subject relevant to the EDF proposal.
- B. Establish procedures for liaison with AIHC.
- C. Schedule of meetings.
- D. Establishment of committees and selection of chairpersons.
- E. Coordination of expert witnesses with AIHC.
 1. Oral presentation.
 2. Written submission.

SPI-PVC & VCM PRODUCERS GROUP
SOURCE & DISPOSITION OF FUNDS
AS OF 12-31-77

OUT E:

AMOUNT

1. <u>Carryover (Loss) From 1976/77 Operations-Per</u> <u>Ledger Print-Out</u>					
Plus: Duplicate Entry of Allied Chem. Payment					\$(28784.58)
Less: Assessments Paid-Not Recorded on Ledger					(2460.00)
Great American Chemical				912.00	
Hooker Chemical				<u>167.50</u>	
Net (Loss) Carryover from 1976-1977					\$(30165.08)
2. <u>Assessments:</u>	<u>Total</u>	<u>Assmt.</u>	<u>Net Assmt.</u>		
	<u>Assmt.</u>	<u>Paid</u>	<u>Due</u>		
a. 1976/77 Assessment No.3	\$100000.00	\$100000.00	\$ -		
b. 1977/78 Assessment No.1	250000.00	244512.50	5487.50		
c. 1977/78 Assessment No.2	394100.00	-	394100.00		
Total Assessment Income		<u>\$344512.50</u>		344512.50	
Net Assessments Receivable Per					
Attached Detail				<u>\$399587.50</u>	399587.50
3. <u>Meeting Income:</u>					380.00
Total Funds Available - 12-31-77					<u>\$714314.92</u>

DISPOSITION:

1. <u>Current Year Expenses:</u>					
Legal Expense - Paid thru 12-31-77	\$204711.76				
- Accrued for December	<u>12366.80</u>			\$217078.56	
Public Relations Expense-Paid thru					
12-31-77	\$ 95076.52				
-Accrued for December	<u>10756.73</u>			105833.25	
Meeting Expense (Incl. Travel)				6777.92	
Research & Development Expense				33018.67	
Office Supplies & Expense				896.47	
Telephone & Telegraph Expense				<u>1502.45</u>	
Total Expense thru 12-31-77					\$365107.32
Net Funds Available at 12-31-77					<u>\$349207.60</u>