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Re: SPI-PVC Safety Group
SPI-PVC Manufacturing Technology Committee
SPI-PVC Health Committee
SPI-PVC Communications Committee
SPI-PVC Lawyers Subcommittee

Gentlemen:

Attached hereto is a letter from Harold Himmelman at Beveridge, Fairbanks & Diamond written to cover the Environmental Protection Agency's Draft Inspection Manual for Vinyl Chloride.

Due to the technical nature and bulk of this document, copies are being supplied at this time only to the listed Voting Representatives and members of the Manufacturing Technology Committee.

Having received this document only late Monday afternoon, we are sending it out without having an opportunity to review it. As always, if before we report to you further about the Manual you have any questions, comments or suggestions with regard to it, please do not hesitate to let us know.

Cordially yours,

Joseph E. Hadley, Jr.

Enclosures

cc: (Without copies of Manual)
Mr. William H. Bricker
Mr. O. P. Thomas
Mr. Richard Fleming

UCC 103573

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December 5, 1977

BY HAND

Joseph E. Hadley, Jr.
Keller & Heckman
Suite 1000
1150 Seventeenth Street, N.W.
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Dear Joe:

I am enclosing herewith the vinyl chloride field inspection manual which EPA's Division on Stationary Source Enforcement has asked me to distribute to the industry. You will recall from my September 29, 1977 letter that the field inspection manual was originally prepared in draft by Research Triangle Institute. The manual, as you know, will be used by EPA inspectors during on-site visits to VCM, PVC and ethylene dichloride plants.

In addition to regional EPA offices and Research Triangle Park, SPI is the only other party to have received a copy of this draft as of this time. The Division of Stationary Source Enforcement wants all comments on the draft submitted by January 6, 1978. Currently, the Division plans no hearings on the manual and hopes none will be necessary. However, should there be major areas in need of further discussion, there is some possibility that an informal hearing or meeting might be held. EPA hopes to make the field manual final, and to issue it, within two or three months.

Although I am sure that the entire manual will be of extreme interest, I should report that SPI has been especially requested to review Chapters 2 and 3.

Sincerely yours,



Harold Himmelman

HH:cl

Enclosure

cc: John R. Lawrence
Robert Laundrie

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