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Robert D. Buehler
Staff Vice President
Government Relations

April 16, 1984

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DR. R. T. GOTTESMAN

Dr. Roy T. Gottesman
Executive Director
The Vinyl Institute
355 Lexington Avenue
New York, New York 10017

Dear Roy:

Thank you for your memo regarding Gary Baise's suggestion involving Science Advisory Board Evaluation of Ambient Air Exposures to Vinyl Chloride.

Your comments made sense to me. W. C. Holdbrook also supplied me with comments which were in line with your views.

I appreciate your taking the time to write me.

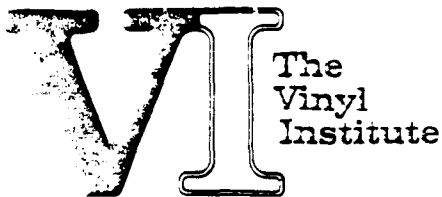
Sincerely,



Robert D. Buehler

RDB:go

cc: Dr. B.A. DiLiddo
Dr. M.M. O'Mara
George R. Snider, Jr.
W. C. Holbrook



File
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MEMORANDUM

To: Mr. Robert Buehler

From: Dr. Roy T. Gottesman

Subject: **Scientific Advisory Board
Evaluation of Ambient Air Exposures
to Vinyl Chloride**

April 9, 1984

cc: Dr. B. DiLiddo
Dr. M. O'Mara
Mr. G. Snider
Mr. W. C. Holbrook-
as information

This is in response to your memorandum of March 26 and relates to the suggestion by Gary Baise that consideration be given to having EPA's Science Advisory Board look into the scientific data supporting the regulation on ambient air exposures to vinyl chloride. While this suggestion has merit, I think that it could delay some of the work which has been carried out over the past year by The Vinyl Institute Manufacturing Practices Committee with EPA.

On February 15, we submitted to EPA at Research Triangle Park the results and data of a survey relating to relief valve discharges in current vinyl chloride and PVC plants. At present, EPA and its contractor, Radian Corporation, have been involved in reviewing this information.

I am advised that the EPA staff expects to have a proposal drafted for internal review by the end of April, and we will receive a copy for our review in July. It is their plan that the draft will be submitted to NAPTAC (National Air Pollution Control Technique Advisory Committee), a peer review group within EPA which evaluates draft regulations, by the end of August.

Inasmuch as this progress is being made by EPA, it would be our expectation that a written proposal involving changes on the existing vinyl chloride standard could be forthcoming within the next six months or by the end of this year.

In view of all of this, it is my judgement that having a Science Advisory Board constituted to review the scientific data would only delay the considerable progress which has already been made with EPA in trying to get the existing standard modified.

I will be interested in your comments.

Roy T. Gottesman

RTG:jmd
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