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March 12, 1979

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Joseph E. Hadley, Jr., Esq.
Keller & Heckman
Suite 1000
1150 17th Street, N.W.
Washington, D.C. 20036

Re: Proposed Amendments to the National
Emission Standard for Vinyl Chloride

Dear Joe:

This letter will update you on the status of the amendments to the Vinyl Chloride Standard and a proposal by the counsel for the Environmental Defense Fund (EDF).

Status

Susan Wyatt advises she is still drafting the proposed Amendments and will forward them when her work is completed and approved.

EDF Proposal

Counsel for EDF is also aware EPA is considering amendments and has a proposal for consideration by the PVC Safety Group (Group). EDF would consider dropping its opposition to the existing National Emission Standard for Vinyl Chloride if some compromise amendments could be agreed to by EDF, EPA and the Group. First, EDF Counsel wants to know if we are willing to meet with his people and determine if some final resolution can be developed. Second, EDF would like to have a joint meeting with EPA to determine in detail what Ms. Wyatt is drafting and see if some joint resolutions can be developed.

We advised EDF's Counsel that we would advise you and the members of his proposal. At this time EDF does not have a complete proposal to make to us regarding compromise amendments.

Recommendations:

1. The PVC Safety Group needs to determine if it is

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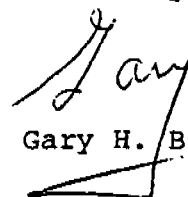
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interested in pursuing a compromise with EDF.

2. If so, we would advise EDF Counsel that the PVC Safety Group is interested in pursuing such an idea but the Group must have more information on what it is EDF will be proposing.
3. If there are potential areas for compromise, then the Group might consider a joint meeting with EDF and EPA. If there are no potential areas, then such a meeting would be a waste of our members' time.

If you have any questions, please advise.

Cordially,


Gary H. Baise

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