



CHEMICAL MANUFACTURERS ASSOCIATION

January 7, 1988

Mr. Peter L. de la Cruz
Keller and Heckman
1150 17th Street, NW
Suite 1000
Washington, DC 20036

Dear Mr. de la Cruz:

Thank you for your correspondence of December 30 regarding the Vinyl Chloride Mutual Aid Assistance program.

We recognize this program was never formalized, and that it was more of a "gentlemen's" agreement among the producers involved. However, during the years it was active, the program was one of the better tools CHEMTREC was able to use to the industry's advantage. Quite often during a train derailment actual shipper identification is impossible to obtain at the time of initial call to CHEMTREC. It was quite valuable to have this resource for VCM response available during such instances.

During the later part of 1986, an attempt was made by us to revive the program. Each listed member was approached and asked to indicate his preference to one of three options. They were: 1) continue and reorganize the VCM plan to reflect the SPI withdrawal from sponsorship of the plan; 2) incorporate the VCM plan into the CHEMNET program; and 3) disband the VCM mutual aid plan without additional action. The majority preferred to disband.

Although our records were modified to indicate that the VCM plan no longer existed, some references remained in our operations manual and thus a recent attempt was made to activate the system.

Please be assured all files and references to this voluntary program have been removed from our operational files.

Sincerely,



Joe J. Mayhew
Director, National Chemical
Response and Information
Center (NCRIC)

JJM/ejf

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DR. R. I. GOTTESMAN

Mr. Joe J. Mayhew, Director
National Chemical Response
and Information Center
Chemical Manufacturers Association
2501 M Street, N.W.
Washington, D.C. 20037

Re: Vinyl Chloride

Dear Mr. Mayhew:

I am writing on behalf of the Vinyl Institute, a division of The Society of the Plastics Industry, Inc. (SPI), concerning response procedures for incidents involving vinyl chloride. This letter is intended to confirm the propriety of the Chemical Transportation Emergency Center's (CHEMTREC) current handling of vinyl chloride in the same manner as other chemicals.

In 1976, an SPI division known as the "VCM/PVC Producers Group" met and attempted to create an emergency response plan for incidents involving vinyl chloride under which the producers would respond to accidents located closest to their facilities regardless of the actual manufacturer or shipper. This was sometimes referred to as the VCM Voluntary Emergency Response Program and also the Vinyl Chloride Mutual Assistance Program. Participants in this program included Borden Chemical Company, Conoco Chemicals, Diamond Shamrock Chemical Company, Dow Chemical Company, General Tire and Rubber Company, BFGoodrich Chemical Company, Goodyear Tire and Rubber Company, Great American Chemical Company, Hooker Chemical and Plastics Company, PPG Industries, Shell Chemical Company and Stauffer Chemical Company. These companies and others may have written to

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CHEMTREC in 1976 and 1977 authorizing CHEMTREC to release the company's name and telephone numbers and the location of response teams when, in CHEMTREC's judgment, the company's response personnel were in a geographic position to render aid most effectively.

Although well-intentioned, this mutual assistance program did not work as a practical matter. We understand that CHEMTREC voluntarily retired the files relating to this program some years ago. Since the initial attempts to organize the program, the industry has undergone substantial consolidation. This, accompanied by shifts in the geographic distribution of production facilities, have also minimized the underlying rationale for the program. Moreover, since there is no universally-followed standard for equipment coupling, technical obstacles to an effective mutual response program exist.

We trust that this letter will adequately summarize the reasons for CHEMTREC's discontinuance from the program and serve as a file memorandum rescinding any company authorizations. If you have any comments or questions, please let me know.

Sincerely,

Peter L. de la Cruz

Peter L. de la Cruz

cc: Robert D. Luss, Esq.
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