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TO: VI Partners

DATE: February 11, 1994

FROM: John Opdycke

COPIES: VI Board Members
Issues Management Committee

SUBJECT: EPA Chlorine Elimination Proposal

Bob Burnett has asked me to contact you about a very serious development that threatens the future of the entire vinyl industry.

No doubt you have all seen or heard media coverage of the EPA's plans to announce "a national strategy to reduce the use of chlorine." (I've included an article from the February 2 *USA Today* as a reference.)

The first news of the announcement came via a leak to UPI from Greenpeace. That news was followed quickly by a press release issued by the EPA's headquarters in Washington outlining the agency's recommendations for reauthorization of the Clean Water Act. As part of that reauthorization, EPA is requesting funding from Congress to "develop a strategy that would prohibit, reduce or substitute for chlorine and chlorine compounds."

It's unclear, based on early feedback the Chlorine Chemistry Council has received from the Clinton Administration, whether or not the release actually reflects the Administration's position on this issue. Some Administration insiders are disavowing the plan. It is clear, however, that Greenpeace was privy to the announcement in advance and likely has been instrumental in shaping the recommendation itself.

At any rate, this is pretty unsettling stuff, and it's time to let the White House and other key elected officials know loud and clear how the vinyl industry feels about this potential attack on our livelihood.

Here's what the VI is requesting Partners to do in coordination with their company's government affairs staff:

- **Contact the White House.** You can do this either by phone (recording a message), fax, electronic mail or letter, or a combination of all four. Listed on the next page are the White House phone and fax numbers, e-mail contact and mailing address for receiving comments from the general public. Included in this packet are talking points for you to use when leaving a phone message, faxing a comment or sending an e-mail message, as well as a model letter that you should adapt to your personal situation and writing style.

CTL014852

Direct your correspondence to:

President William J. Clinton
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500
Phone: (202) 456-1111
Fax: (202) 456-2461
e-mail: (via Internet) President@Whitehouse.gov

- **Write/Visit Key Congressional Representatives.** Mailing addresses for the key U.S. Representatives on the subcommittee responsible for this issue are included in this packet. You are also encouraged to contact any other Congressional representatives from your state and district who are not on this committee. Tell them this is an issue of concern to their constituents. Their addresses can be obtained by calling their local office listed in the "federal government" section of your phone book. The same model letter for the White House can be adapted for these folks. If any of you have personal contacts with a Senator or Representative in your area, please make an effort to call them and arrange for a visit to explain the vinyl industry's position on this issue in person.
- **Communicate with Your Customers and Suppliers.** Advise your customers and suppliers of the EPA announcement and the vinyl industry's response. A sample letter that you can adapt to your particular situation is included in this packet. The letter includes language that asks for customers' and suppliers' support on this issue; use this as you see fit.
- **Let Us Know How It Goes.** It is very important that we know what contacts have been made so that we can plan further action accordingly. Please send me copies of any correspondence you send out by fax or mail, or a note conveying any phone or e-mail messages or personal contacts you make.

It is extremely important that the vinyl industry be out in front on this issue with a strong, unified message spoken by many voices. Please make sure your voice is among them.

As always, thanks for your continued work on behalf of the Vinyl Institute and the Partners Program.

JOHN

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Draft letter for the White House and Congressional Representatives. Provided as a model only. Please adapt this to your own circumstances and put as much of the letter as possible in your own language. Use the talking points provided for additional reference. This is very important; it does no good to send federal officials form letters.

Dear Mr. President/Senator/Congressman(woman)_____:

My company is located in (name of city and state), employs XXX people and pays wages totalling \$XXX. The recent announcement outlining the U.S. EPA's recommendations for reauthorization of the Clean Water Act that included the provision to develop "a national strategy for substituting, reducing or prohibiting the use of chlorine and chlorinated compounds" has put the future of my company in very serious jeopardy.

This provision of the plan is not based on sound science. "Prohibiting" the use of chlorine, and products that contain chlorine, without justification, will cause irreparable damage to the U.S. economy and severely diminish U.S. global competitiveness.

Chlorine is the essential ingredient in the manufacture of polyvinyl chloride plastics, commonly known as PVC or vinyl. The vinyl industry and its direct customers employ approximately 100,000 people in the U.S. Many more are employed in allied and supplier roles to the vinyl industry, or in end-product production that is dependent on vinyl as a raw material. Products made from PVC include blood bags, and many other medical device applications, plumbing and drainage pipe, and numerous other building materials.

The process used to arrive at the chlorine recommendation was unfair; EPA included activists like Greenpeace in the process, but excluded those who would be most immediately affected: those in industry. In addition, this unbalanced process reflects a departure from (your/President Clinton's) pledge to run an open, inclusive Administration.

Further, this action is unnecessary; the vinyl industry is already fully regulated and operates within those standards, and has a 50-year record of safe performance.

The EPA clearly has a predetermined objective with regard to chlorine and chlorine-containing products such as vinyl. I strongly urge you to consider the very serious implications of this strategy and hope that you will adhere to the importance of sound science and risk assessment when considering any recommendations made regarding the use of chlorine.

Thank you for giving this issue your most serious attention.

Sincerely,

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VI/EPA 2/11/94

Draft letter provided as a model for communicating with your customers and suppliers. Use a version of this letter and the other materials in this packet to get your customers and suppliers to support this issue.

Dear Customer/Supplier:

In a proposal to Congress regarding reauthorization of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has asked for funding to develop "a national strategy for substituting, reducing or prohibiting the use of chlorine and chlorinated compounds." As I'm sure you're well aware, the vinyl industry is fully dependent on the use of chlorine, and if the EPA is successful, (Customer letter: our ability to provide you with high performance, cost-effective vinyl products would be severely jeopardized. Supplier letter: our industry will face grave consequences, leading to unwarranted reduced demand for the goods and services you provide.)

First, let me assure you that we strongly object to the EPA's proposal and are working with our colleagues throughout the vinyl industry to defeat this proposal.

Second, we need your help. Our company has already begun to voice its opposition to the Administration's proposal. Now, we need you and all of our (customers/suppliers) to send a clear message to the White House* and Congress.

The materials that will help you get started are enclosed. Your active participation in this effort is critical to successfully defeating this measure.

We are confident that when the Administration and Congress are reminded of the vital contribution vinyl products make to everyday life and the U.S. economy, they will reconsider their proposal.

If you have any questions or concerns about this issue, please call me. And, thanks in advance for your help.

Sincerely,

*Direct your correspondence to:

President William J. Clinton
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500
Phone: (202) 456-1111
Fax: (202) 456-2461
e-mail: (via Internet) President@Whitehouse.gov

CTL014855

VI/EPA 2/11/93

Vinyl Industry Response
to the EPA's Anti-Chlorine Strategy
Talking Points for White House and Legislative Correspondence

Here are some suggested points about the recent EPA announcement to "develop a national strategy to reduce the use of chlorine" that you can include in your phone calls, faxes, e-mail messages and letters to The White House, key Congressional Committee members and Senators and Representatives from your area:

- *The EPA proposal is deficient for the following reasons:*
 - The U.S. EPA recommendation on chlorine is not based on sound science. "Prohibiting" the use of chlorine, and products that contain chlorine, without justification, will cause irreparable damage to the U.S. economy and severely diminish U.S. global competitiveness.
 - Industry was not involved in any way in the process used to bring these recommendations forward. However, Greenpeace and other activist organizations were party to and participated in this process.
 - It ignores laws and regulations already in place to address health and environmental concerns about potential environmental contaminants. The vinyl industry supports these laws and regulations, adheres to them, and encourages EPA to enforce them.
 - It conflicts directly with EPA's own response to the International Joint Commission specifically rejecting sunseting all uses of chlorine and chlorine containing compounds. Rather, the EPA claimed it would pursue a due-process approach based on sound science. In addition, the EPA's response acknowledged chlorine's socio-economic importance.
- *The vinyl industry believes the process should be:*
 - Based on sound science that includes an examination of all available evidence and risk-benefit analysis of chlorine and chlorine-containing products such as vinyl, and potential alternatives.
 - Fair and balanced, involving all parties that will be affected by its outcome.
 - Undertaken with full consideration of socio-economic factors for both chlorine and chlorine-containing products such as vinyl, and possible alternatives.
- *Benefits of the vinyl industry:*
 - Vinyl has become one of the most widely used materials because of its safe record of performance dating back over 50 years. It is a highly stable material. The numerous products made from it present no threat to the environment, and make a major contribution to our standard of living.
 - The industry and its direct customers employ approximately 100,000 people in the U.S. Many more are employed in allied and supplier roles, or in end-product production that is dependent on vinyl as a raw material.
 - Vinyl is the world's most versatile plastic with applications found in virtually every industry, including health care, communications, aerospace, automotive, retailing, textiles, construction, durable goods and agriculture.

2/11/94

CTL014856

**WATER RESOURCES AND THE ENVIRONMENT SUBCOMMITTEE
OF THE
HOUSE PUBLIC WORKS AND TRANSPORTATION COMMITTEE**

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NJ	Menendez, Robert	D	1531 Longworth House Office Bldg., Wash., DC 20515-3013 911 Bergen Ave., Jersey City, NJ 07306	(202) 225-7919 (201) 222-2828
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NY	Nadler, Jerrold	D	424 Cannon House Office Bldg., Wash., DC 20515 1841 Broadway, Ste. 800, New York, NY 10023	(202) 225-5635 (212) 489-3530
NY	Quinn, Jack	R	331 Cannon House Office Bldg., Wash., DC 20515-3230 403 Main St., Ste. 510, Buffalo, NY 14203-2199	(202) 225-3306 (716) 845-5257
OK	Inhofe, James M.	R	442 Cannon House Office Bldg., Wash., DC 20515-3601 Ste. 530, 1924 S. Utica, Tulsa, OK 74104	(202) 225-2211 (918) 581-7111
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WV	Rahall, Nick J. II	D	2269 Rayburn House Office Bldg., Wash., DC 20515-4803 815 Fifth Ave., Huntington, WV 25701	(202) 225-3452 (304) 522-6425
WV	Wise, Robert E. Jr.	D	2434 Rayburn House Office Bldg., Wash., DC 20515-4802 107 Pennsylvania Ave., Charleston, WV 25302	(202) 225-2711 (304) 342-7170

CTL014858

Chlorine targeted for cutback

By Rae Tyson
USA TODAY

The Clinton administration Tuesday unveiled a clean water plan that could eliminate most uses of chlorine, now in thousands of products.

"That is good news," says Lee Botts of the Lake Michigan Federation, a Chicago-based group favoring a chlorine ban.

Industry produces 12 million tons of chlorine a year — \$72 billion worth — for use in such products as paper, plastics, pharmaceuticals, pesticides, water treatments and bleach.

Activists say chlorine-based products destroy the environment. Studies suggest that some of the most toxic — PCBs, dioxin, DDT — are causing health problems, particularly among fish-eating populations along the Great Lakes.

The proposal, unveiled by EPA Administrator Carol Browner, was immediately denounced by industry as expensive — and unnecessary.

"There is only one word to describe our industry's reaction: outrage," says Fred Webber, president of the Chemical Manufacturers Association.

But activists say environmental danger is extensive.

"The fish, the wildlife and the humans are all being affected," says Paul Muldoon of Pollution Probe, a Canadian group campaigning for the ban.

The Clinton proposal, part of a comprehensive plan to overhaul the Clean Water Act, would give industries time to develop alternatives — a time-consuming process some say could cost \$60 billion.

The Clinton plan also would boost wetlands protection and curb urban and farm runoff.

"That could have great benefits," says Vicky Harris, clean-up coordinator for Wisconsin's Green Bay.

► EPA pursues agenda, 4A

A green week for Congress

By Rae Tyson
USA TODAY

In addition to seeking an end to most uses of chlorine, the Clinton administration is focusing on other environmental issues this week, including an overhaul of the Superfund cleanup program.

Tuesday, Environmental Protection Agency Administrator Carol Browner announced a comprehensive plan to overhaul the Clean Water Act.

Thursday, Browner unveils proposed changes in the Superfund, a \$12 billion program to clean up the USA's abandoned chemical waste sites.

Browner's plan is expected to suggest widespread changes in liability standards and cleanup requirements. The fund is largely financed by a tax on the petrochemical industry.

Though the Clinton administration proposal will soon be out, there is no guarantee that Congress will tackle a Superfund overhaul this session.

"How far we get on Superfund will depend on when we finish with clean water," says Eric Federling, spokesman for the House Public Works and Transportation committee.

Also on Congress' agenda:

► **Safe Drinking Water Act**, which sets health standards for all public water supplies. Passage seems likely this session, particularly after well-publicized drinking water problems last year in Milwaukee and Washington, D.C.

► **Resource Conservation and Recovery Act**, which regulates solid and hazardous waste disposal. Action is unlikely even though Sen. Dan Coats, R-Ind., and others are pushing for restrictions on wastes shipped across state lines.

Prospects for congressional action are slim because the waste law "only has one engine

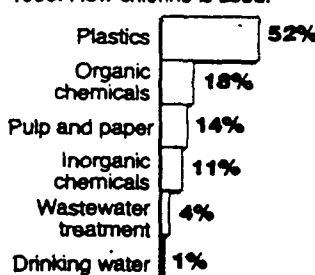
Proposal limits chlorine use

A Clinton administration proposal to toughen clean-water laws would eliminate many uses of chlorine, blamed for damaging the environment. Earlier, the International Joint Commission proposed banning the chemical.



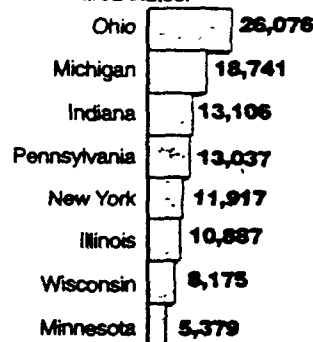
Chlorine widely used

12 million tons of chlorine are produced annually. Sales of chlorine-dependent products brought in an estimated \$71.4 billion in 1990. How chlorine is used:



Chlorine-dependent jobs

1990 chlorine-dependent employment in Great Lakes-area states:



Effects of chlorine-based pollutants on animal life

People	Memory problems, stunted growth, cancer
Bald eagle	Eggshell thinning; embryo, adult death
Mink and otter	Reproductive problems
Lake trout	Reproductive problem, hatching problems, death
Snapping turtle	Embryo abnormalities, death

Source: USA TODAY research

By Marty Baumann, USA TODAY

pulling it, and that's the interstate waste issue," said Rick Hind of Greenpeace.

► **Endangered Species Act**, which protects plants and animals facing extinction. The law has been surrounded by controversy because, among other things, it was used to restrict logging in the Northwest to save the spotted owl.

Interior Secretary Bruce Babbitt has asked Congress to delay reauthorization until he has an opportunity to work with the existing law.

"I think they'll wait until another time on endangered species," said Debbie Sease, Sierra Club legislative director.

Complicating any predictions about congressional intent is the prospect of delaying action on health-care reform, which will involve many of the committees handling environmental matters.

"It may be a recipe for grid-

lock," Hind said.

Also Tuesday, a panel representing northeastern states from Maryland to Maine voted to recommend that Washington set stricter car emission standards in their states.

The Ozone Transport Commission, established under the federal Clean Air Act, seeks a low emissions vehicle program that applies to all 1999 and subsequent model year cars and light trucks. The new standards would reduce ozone, a major ingredient in smog.

The affected region includes Connecticut, Delaware, Maine, Massachusetts, Maryland, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, the District of Columbia and the part of northern Virginia included in the Washington metropolitan area.

► **Clean water**, 1A
► **Superfund**, 10A

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