

The Society of the
Plastics Industry, Inc.

355 Lexington Avenue
New York, New York 10017
(212) 573 9400

RECEIVED

MAR 13 1978

R. N. WHEELER, JR.

March 10, 1978

TO: THE PVC SAFETY GROUP

Gentlemen:

Please note as indicated in the Minutes of the PVC Steering and Communications Committees, it is planned that the PVC Safety Group will take part in the EPA meeting scheduled for March 23 at the EPA offices, Waterside Mall, 410 M. Street, S.W. Washington, D.C. Room 3906 at 8:30 A.M.

It would be advisable to have a representative from your company attend this meeting if at all possible. You can expect that a draft of the presentation material will be sent to your attention about March 20.

Very truly yours,

John R. Lawrence
John R. Lawrence
Technical Director

JRL:gm

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PVC SAFETY GROUP

STEERING COMMITTEE

Tuesday, February 28, 1978
8:30 A. M.

Sheraton Hopkins Hotel
Cleveland, OHIO

SUMMARY:

- 1 - PVC Safety Group has been designated by The American Industrial Health Council (AIHC) to represent them at the EPA meeting to review its carcinogen policy on March 23. PVC Safety Group members are urged to be present.
- 2 - Nominating Committee recommends present officers of Steering Committee to serve for a second year.
- 3 - The next meeting of the full PVC Safety Group is March 31, 1978 in Arlington, Virginia.

ATTENDEES:

D. C. Nuechterlein - CHAIRMAN - Dow Chemical USA, 2020 Dow Center, Midland, Mi 48640
 E. G. Ackerman - Diamond Shamrock Corp., 1100 Superior Avenue, Cleveland, Ohio 44114
 A. Ross Adams - Air Products & Chemicals, 400 Orchid Circle, Emmaus, Pa 18049
 Gary H. Baise - Beveridge, Fairbanks & Diamond, One Farragut Square South, Wash. D.C.
 J. T. Barr - Air Products & Chemicals, Box 538, Allentown, Pa 18105
 R. W. Fortenbach - Shell Chemical Co., One Shell Plaza, Houston, Texas 77001
 Ralph L. Harding - SPI - 355 Lexington Avenue, New York, NY 10017
 Francis Hor - Firestone Plastics Co., P. O. Box 699, Pottstown, Pa 19464
 Jack Jaglom - The Pantasote Co., of N.Y. 26 Jefferson Street, Passiac, NJ 07055
 R. W. Laundrie - General Tire & Rubber Co., One General Street, Akron, Ohio 44329
 John R. Lawrence - SPI - 355 Lexington Avenue, New York, NY 10017
 William Rupp - Tenneco Chemicals, P. O. Box 365, Piscataway, NJ 08854
 Dick Savage - B. F. Goodrich Chemical Div., 6100 Oak Tree Blvd., Cleveland, Ohio 44131
 Steve Schaefer - Diamond Shamrock Corp., 1100 Superior Avenue, Cleveland, Ohio 44114
 Don K. Spencer - Shell Chemical Co., One Shell Plaza, Houston, Texas 77001
 Dale W. Sullivan - Ethyl Corp., 451 Florida Blvd., Baton Rouge, La 70801
 Todd Walker - Firestone Plastics Co., Firestone Blvd., Pottstown, Pa 19464
 Professor Richard Wilson - Harvard University.

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PVC Safety Group to report AIHC at EPA hearing

- 1 - Chairman Nuechterlein opened the meeting by calling on Messrs. Schaefer and Barr to review the results of the meeting held with the AIHC Steering Committee relative to the review of EPA's carcinogen policy. The conclusion of this meeting was that AIHC wishes the PVC Safety Group to act for AIHC at the EPA hearing scheduled for March 23. In doing this, AIHC would make available any of their background preparations that have been made for the chemical industry's response to the OSHA Generic Carcinogen proposals.
- 2 - Mr. Baise presented a Proposal Work Plan for an SPI presentation at the EPA March 23 meeting on its generic regulation of carcinogenic air pollutants. (Attachment A).

With respect to broadening the SPI comments to cover materials other than just vinyl chloride or plastics related chemicals, he suggested it would be difficult to do this adequately by March 23. Reference was made to two reports that might be cited to EPA as a basis for any changes in the EPA's carcinogen policy:

- . Principles for Evaluating Chemicals in the Environment - National Academy of Sciences, 1973
- . Decision Making for Regulating Chemicals in the Environment - National Academy of Sciences, 1975.

In discussing the policy consideration, the group reached the following decisions:

- i) Seeking a delay in the March 23 hearing would not be advisable.
- ii) The AIHC's Alternatives document can be used as a basis for critiquing the EDF proposal. However, legal counsel pointed out that there are some fine points of differences between the legislative authority of OSHA and EPA and these should be taken into account.
- iii) It will be important to coordinate the approach used in the AIHC proposal with prior industry positions at EPA.
- iv) It will onyl be necessary to make reference to industry's previous comments on EDF position on vinyl chloride and provide a summary of the industry's position on these points.

3 - Risk-Benefit Concepts

Professor Richard Wilson of Harvard University was introduced by Dr. Adams. He gave a brief statement on his risk-benefit concept as related to vinyl chloride and other carcinogen risks.

He pointed out that because it breaks down in the atmosphere rapidly that the concern should be the primary contact (i.e., exposure in the workplace). On the basis of EPA's 1976 regulation, the risk projects to perhaps one case in 20 years.

Several references were made to Professor Wilson's position papers on this subject:

- . Risk-Benefit Analysis for Vinyl Chloride
(ACS Meeting, September 1, 1976)
- . Magnitude of the Chemical Cancer Problem:
A Review of Some Opinions and Numbers.

NOTE: Copies of these papers can be obtained from John Lawrence at the SPI office.

4 - Committee Reports

- (a) PVC Fire Safety Committee - Mr. Dan Kent reviewed the activities of the committee making specific reference to the minutes of the January 5 meeting. He also called attention to the toxicity studies proposed to be conducted at the University of Michigan on off gases from burning materials.

The Steering Committee recommended that PAC be urgently requested to support this study because it involves all types of plastics.

- (b) Financial Report - Mr. Walker distributed the report on expenses through December 1977. (Attachment B). It was also indicated that approximately 50% of the January assessment of \$400,000 has been received.

In response to a request by the Chairman, Mr. Walker indicated that a budget projection will be prepared for the full Committee to review at the March 31 meeting.

- (c) Communications Committee - On behalf of this committee Mr. Ackerman reported that activities have been at a low level pending EPA's action on the proposed VC amendments. It was agreed that the Communications Committee should be ready to provide appropriate backup to the Group's participation at the EPA meeting on March 23.

A summary of Hill & Knowlton's activities for the month of January on behalf of the Group is enclosed. (Attachment C).

Nominating Committee - Dr. Adams reported that the Nominating committee recommends that Messrs. Nuechterlein, Schaefer and Walker be re-nominated to their present offices and that their respective companies be nominated to the Steering Committee for a three year term. It was agreed that these nominations should be directed to the attention of the full PVC Safety Group for action at the March 31 meeting.

Health Committee - Mr. Nuechterlein reported on behalf of Dr. Torkelson that the Health committee was still searching out an organization maintaining complete records on VC health studies and related information. It was urged that one of the several organizations under consideration be retained for a trial period of 6-12 months.

5 - EPA Hearing Plans

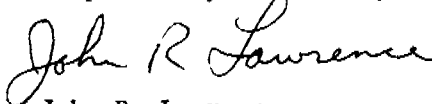
Beveridge, Fairbanks & Diamond will prepare a draft of an industry presentation to cover legal, technical and health considerations. It was agreed that we should make it clear that comments were preliminary in response to the "meeting" context rather than a "public hearing". Further, that we should reserve the right to make further comments relative to any unresolved technical considerations.

Plans were made for Messrs. Baise, Laundrie and Barr, to meet with the AIHC's Scientific Committee on March 7. Final plans for participation at the March 23 meeting are to be reviewed with the AIHC Steering Committee in Chicago on March 15. A draft of the presentation material will be sent to the full PVC Safety Group by March 20 if it is at all possible.

It is urged that all PVC Safety Group member companies try to be represented at the March 23 meeting.

- 6 - The next meeting of the Steering Committee will take place at 8:00 a.m. just prior to the meeting of the full committee on Friday, March 31, 1978.
- 7 - The meeting adjourned at 2:40 p.m.

Respectively submitted,



John R. Lawrence
Technical Director

ATTACHMENTS
3/8/78

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2/24/78

Proposed Work Plan for the SPI Presentation
at the EPA March 23 Hearing on Generic
Regulation of Carcinogenic Air Pollutants

I. Overall Approach

EPA has announced that it intends in its March 23 hearing to solicit recommendations leading to possible development of a proposed generic cancer policy for airborne carcinogens. It may be desirable simply to put EPA on notice that SPI intends to be heard forcefully on EPA's cancer policy, address the eight questions EPA posed in its amendment, and then raise the literally dozens of questions posed by EDF's petition. We should indicate that the Agency needs far more time and additional meetings before it could possibly consider proposing any new scheme.

II. Committee Work Needed Before March 23.

A. Policy Considerations

1. Whether to seek a delay of the March 23 hearing or to press for prompt EPA action because EPA's current policy is acceptable.
2. Development of an approach to EDF's proposal for a classification scheme for airborne carcinogens; consider how to distinguish EPA concerns from OSHA.
3. Coordinate approach of the AIHC proposal with prior industry position at EPA.
4. How to challenge EDF's presentation of the "Vinyl Chloride Story." How to treat EDF's statistics and such issues as substitutes, threshold, zero emissions, extrapolation of animal data to humans, replication, and offset.

B. Technical and Health

By March 10, 1978, SPI should have papers prepared analyzing the EDF proposal in detail (statement by statement), raise all of the questions necessary to challenge that proposal, and consider an appropriate answer or alternative to the EDF proposal. Among the overriding issues are:

1. To what degree and in what manner should EDF cancer statistics be challenged?
2. What information is available to rebut, correct, supplement the studies relied upon by EDF?
3. What position should be taken with regard to EDF's non-threshold and zero emission theories?
4. What implications are there to the off-set policy?
5. What assumptions/facts does EDF rely upon which are erroneous?
6. What is wrong with EDF's proposed regulatory scheme both theoretically and, assuming implementation, from a practical standpoint?

C. Legal

The Legal Committee should complete by March 10 a review of the legal questions which are posed by the EDF petition. Among the issues are:

1. What is the interrelationship of EPA's authority under the Clean Air Act and the Toxic Substances Control Act, the Federal Insecticide, Fungicide and Rodenticide Act, the Federal Water Pollution Control Act and related laws and regulations?

2. Can EDF's scheme of relying on Section 111 to regulate new sources of Category II substances be effectuated?
3. What procedural safeguards are necessary under any regulatory scheme?

III. Presentation at Hearing

- A. Background. Establish setting for the hearing; identify the key parties; establish SPI stature, experience and standing.
- B. Present policy statement, consistent with overall approach outlined above.
- C. Consider having technical, medical, scientific and legal experts available to testify.
- D. Consider submission of key policy, factual and legal issues and questions raised by EDF petition and the prospect of EPA action.
- E. Call for further informal meetings before decision on whether to even propose regulations.
- F. Establish groundrules if regulations are proposed, such as right of cross-examination.

IV. Other Issues

- A. Consider filing a Freedom of Information Act request to obtain (a) all EPA cancer policy documents which led to its May 1976, statement, and (2) any new information the Agency has received on this subject relevant to the EDF proposal.
- B. Establish procedures for liaison with AIHC.
- C. Schedule of meetings.
- D. Establishment of committees and selection of chairpersons.
- E. Coordination of expert witnesses with AIHC.
 1. Oral presentation.
 2. Written submission.

SPI-PVC & VCM PRODUCERS GROUP
SOURCE & DISPOSITION OF FUNDS
AS OF 12-31-77

SOURCE:AMOUNT

1. <u>Carryover (Loss) From 1976/77 Operations-Per</u>			
Ledger Print-Out			\$(28784.58)
Plus: Duplicate Entry of Allied Chem. Payment			(2460.00)
Less: Assessments Paid-Not Recorded on Ledger			
Great American Chemical			912.00
Hooker Chemical			<u>167.50</u>
Net (Loss) Carryover from 1976-1977			\$(30165.08)
2. <u>Assessments:</u>	<u>Total</u>	<u>Assmt.</u>	<u>Net Assmt.</u>
	<u>Assmt.</u>	<u>Paid</u>	<u>Due</u>
a. 1976/77 Assessment No.3	\$100000.00	\$100000.00	\$ -
b. 1977/78 Assessment No.1	250000.00	244512.50	5487.50
c. 1977/78 Assessment No.2	394100.00	-	394100.00
Total Assessment Income		<u>\$344512.50</u>	<u>344512.50</u>
Net Assessments Receivable Per			\$399587.50
Attached Detail			399587.50
<u>Meeting Income:</u>			380.00
Total Funds Available - 12-31-77			<u>\$714314.92</u>

DISPOSITION:

1. <u>Curr nt Year Expenses:</u>			
Legal Expense - Paid thru 12-31-77	\$204711.76		
- Accrued for December	<u>12366.80</u>		\$217078.56
Public Relations Expense-Paid thru			
12-31-77	\$ 95076.52		
-Accrued for December	<u>10756.73</u>		105833.25
Meeting Expense (Incl. Travel)			6777.92
Research & Development Expense			33018.67
Office Supplies & Expense			896.47
Telephone & Telegraph Expense			<u>1502.45</u>
Total Expense thru 12-31-77			\$365107.32
Net Funds Available at 12-31-77			<u>\$349207.60</u>

HILL AND KNOWLTON, INC.

Memo to: Robert B. Downey, Chairman Date: February 28, 1978
PVC Communications Committee
The Society of the Plastics Industry, Inc.

Subject: PVC "Action Program" Bill and Copies: (See below)
Activities -- January 1978

Following is a breakdown of H&K staff time charges and out-of-pocket expenses billed at cost, and a summary of activities on behalf of the PVC "Action Program" for the month of January 1977:

1. Political Education ---

- o No activities in this category during the month.

2. Radio-TV Training ---

- o No activities in this category during the month.

3. Washington Activities \$ 1,667.00

- o Continued liaison with SPI's Legal Counsel in Washington.
- o Continued to monitor Washington press and regulatory agencies for developments on VCM/PVC-related issues.
- o Discussed with SPI's Legal Counsel actions by EPA re: vinyl chloride (they may not repropose the standard).
- o Discussed with SPI's Legal Counsel impact of Supreme Court decision on asbestos and EPA on PVC or other air pollution actions.
- o Discussed with SPI's Washington Representative, SPI's Legal Counsel, members of Communications Committee and H&K-New York re: Sen. Moss hearings touching on ethylene dichloride.
- o Assembled information on International Trade Commission-U.S. Treasury action re: dumping of PVC sheet and sent to SPI's Legal Counsel.

4. Intra-Industry Communications \$ 1,791.00
- o Researched and prepared draft of copy for "Management Summary" Vol. III, No. 1.
 - o Monitored national, international, trade, medical and environmental press for mention of VCM/PVC. Sent major stories to SPI.
5. Staff and Committee Liaison \$ 2,060.00
- o Prepared activities report for PVC Safety Group covering communications activities from April through November 1977.
 - o Preparations for and participation in meeting of PVC Communications Committee on January 9.
 - o Preparations for and participation in meeting of PVC Steering Committee on January 10.
 - o Developed detailed budget and program outline for communications activities for PVC Safety Group thru end of May 1978.
6. Intelligence and Document Development and Updating \$ 1,553.00
- o Discussed a series of updated papers to be written on PVC and occupational health. Began researching background materials on papers.
 - o Researched and began drafting new version of the paper "Vinyl Chloride and Birth Defects."
7. Media Contact and Response, including Positive Publicity \$ 1,893.00
- o Story on system to reduce theft of books from libraries, composed of sensing element and special check-out gate made of rigid PVC was carried by Associated Press (All 1,500 newspapers, periodical and broadcast outlets).
 - o Story on how the housewife can stretch her household budget by using certain kinds of items made out of PVC was placed with Lad's Circle (Circulation - 750,000).

- o Story on how the homeowner can save money and energy by heeding the advice of government energy engineers working to combat energy waste in the home - featuring uses of PVC to effect these savings was placed with the Los Angeles Times Syndicate (100 newspapers - readership, 3,000,000).

- o Continued contact with the following magazines/news services on stories which have been placed with them in the past few months:

Associated Press Features
1001 Decorating Ideas
Mechanix Illustrated
Women's News Service
Lady's Circle
Enterprise Science News (NEA)

- o Awaiting approval on service piece for consumer magazine or syndicated column entitled "Six Ways to Prevent Fires in the Home" focusing on the use of smoke and heat detectors to signal an alarm before smoke overcomes the occupants of the house.
- o Continued work on consumer story pitched for garden columns about the growing use of plastics in gardening, focusing on PVC for use in automatic water sprinkling system for the garden; also use of PVC for lining ornamental pools in the garden.
- o Continued working on stories previously listed on activities reports for which additional data is being researched.

8. Out-of-Pocket Expenses \$ 515.44

Telephone and telegraph	\$ 78.86
Miscellaneous publications	7.75
Multilithing and photostats	128.80
Postage charges	194.81
Travel and expenses	105.22

9. Editorial Briefings \$ 261.00

- o Prepared draft of "VCM-PVC Summary" for the press, Vol. III, No. 1

Robert B. Downey

- 4 -

February 28, 1978

10. New Jersey Carcinogens Bill ---
o No activities in this category during the month.
11. PVC Conduit/FDA ---
o No activities in this category during the month.
12. Fire Safety Program Development \$ 1,213.00
o Preparations for and participation in meeting of PVC Fire Safety Subcommittee in Cleveland on January 5.
o Prepared memo on PR problem for fire safety and submitted to you.
13. Out-of-Pocket Expenses (for 11 and 12) \$ 196.85
Travel and expenses \$196.85
- TOTAL \$11,150.29

If you have any questions on the breakdown or activities, please give me a call.

Cordially,

Matthew M. Swetonic

Matthew M. Swetonic

MMS:jmv

cc: PVC Steering Committee
PVC Communications Committee
Messrs. Harding, Collins, Lawrence, McGrath, Nuspliger, Titus, Haley, Heckman, Burleson, Hadley, Durbin, Kiss, Hearle, Bochat, McLoughlin, White

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PVC SAFETY GROUP

COMMUNICATIONS COMMITTEE

Thursday, March 9, 1978
9:30 A.M.

The International Club
Washington, D.C.

ATTENDEES:

Robert C. Downey - CHAIRMAN - B. F. Goodrich Chemical Co., 6100 Oak Tree Blvd.
Cleveland, Ohio 44131
Ed Ackerman - Diamond Shamrock Corp., 1100 Superior Avenue, Cleveland, Ohio 44114
M. C. Carpenter - Dow Chemical, 2020 Dow Center, Midland, Michigan 48640
Joe Hadley - Keller & Heckman, 1150 17th Street, N.W. Washington, D.C. 20-36
Gary Baise - Beveridge, Fairbanks & Diamond, One Farragut Square South, Wash. D.C.
Jerry Blizin - Hill & Knowlton, Inc., One McPherson Square, Vermont at K. St. N.W.
Washington, D. C. 20005
Matt Swetonic - Hill & Knowlton, Inc., 633 Third Avenue, New York, N.Y. 10017
John R. Lawrence - SPI - 355 Lexington Avenue, New York, NY 10017
Ed Collins - SPI - 355 Lexington Avenue, New York, N.Y. 10017

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- 1 - Chairman Downey opened the meeting by calling on Mr. Baise to review the background of the assignment AIHC has tentatively given to SPI/PVC Safety Group to represent them at the March 23 EPA meeting on its cancer policy and the EDF petition on a suggested new carcinogen policy.

Mr. Baise reported on the actions leading to the preparation of a draft statement to represent the PVC Safety Group, SPI and/or AIHC. This statement was presented to the AIHC Scientific Committee on March 7 and will be presented to the AIHC Steering Committee on March 15. The final version will be available for review at various stages before the March 23 meeting.

- 2 - Public Relations Consideration

After considering various alternatives, the committee agreed that the following elements should be developed for PR support to the industry's participation at the March 23 hearing.

- (a) Press Conference
- (b) Radio Actuality
- (c) Press Release
- (d) Coverage

Washington Media

. TV

. Papers

National Media

. All normal channels

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General strategy would be to set up a defensive position to avoid being pre-empted by environmental groups.

Presenters

Two tier -

AIHC Steering Committee member
SPI - PVC Representative - *Fleming, *Walker

Press Conference - March 22 (11:00 A.M.)

Brian McMann)
Richard Wilson) Experts

(No press conference if experts are not available)
(Briefing of experts on March 20, 21 or before)

*Clearance by John Lawrence as soon as possible

3 - Background Documents

Mr. Swetonic will update various PVC/VC background papers for hand-out if necessary.

- 4 - Mr. Downey will prepare a recommendation for presentation of the PR Program to the AIHC Committee on March 15.

Respectfully submitted,


John R. Lawrence
Technical Director

3/10/78