

LAW OFFICES
KELLER AND HECKMAN

1150 17TH STREET, N.W.
SUITE 1000
WASHINGTON, D.C. 20036
(202) 956-5600

May 23, 1989

JOSEPH E. KELLER
JEROME H. HECKMAN
WILLIAM H. BORGHESE, JR.
MALCOLM D. MACARTHUR
WAYNE V. BLACK
TERRENCE D. JONES
MARTIN W. BERCOVICI
JOHN S. ELORED
CAROLE C. HARRIS
MARY MARTHA McNAMARA
MICHAEL F. MORRONE
MARK FOX EVENS
JOHN B. RICHARDS
JOHN B. DUBECK
PETER L. DE LA CRUZ
CHRISTINE A. MEAGHER
SHIRLEY S. FUJIMOTO
LAWRENCE P. HALPRIN
RALPH A. SIMMONS
PETER A. SUSSER

C. DOUGLAS JARRETT
SHEILA A. MILLAR
HELVIN S. OROZEN
GEORGE G. Hisko
FREDERICK J. DAY, JR.
MARCIE E. GREENSTEIN
SUSAN J. FISHER
MARCIA K. COWAN
PATRICK J. KURD
S. CRAIG TAUTFEST
MARK A. SIEVERS
MICHAEL R. BENNETT
G. FRANKLIN KOONTZ
CATHERINE N. ROEMER
RICHARD A. JAFFE
JEFFREY S. KERN
KRIS ANNE MONTEITH***
ELLIOT BELILO****
SHANNON L. DENMAN***
SUSAN E. FOX****

*ADMITTED IN PENNSYLVANIA ONLY
**ADMITTED IN MISSOURI ONLY
***ADMITTED IN VIRGINIA ONLY
****ADMITTED IN MARYLAND ONLY
*****ADMITTED IN CONNECTICUT AND NEW YORK ONLY

SCIENTIFIC
DANIEL S. DIXON
CHARLES V. BEE
ROBERT A. MA
JOHN P. MO
HOLLY
JUSTIN

TELECC

42 20
TELECOM
(202) 296-7

CABLE ADDRESS

WRITER'S DIRECT DIAL NO.

(202) 956-5622

TO: SPI Vinyl Institute EDC Working Group
RE: Filing of OSHA Petition for Stay and
Reconsideration of PEL for EDC

Gentlemen:

Enclosed is a receipt-stamped copy of the Petition that we filed today with the Occupational Safety and Health Administration (OSHA) seeking a stay and reconsideration of the provisions of OSHA's final air contaminants rule relating to ethylene dichloride (EDC). The petition was filed with OSHA's Office of the Solicitor. Because of the many helpful comments and suggestions we received from all of you, the final petition is much improved over the original draft that we circulated in April and now represents our best case for administrative relief from the Agency.

After the Solicitor's Office has had an opportunity to review the petition, we will be contacting Charles Gordon of that office to discuss OSHA's position on the issues we have raised. Of course, we will be back in touch with you as soon as we receive a response from OSHA. If you should have any questions or comments in the meantime, please do not hesitate to call.

Cordially yours,


Mark A. Sievers

Enclosure

cc: Larry Thomas
Robert W. Sherman
Roy T. Gottesman, Ph.D.
Meredith M. Scheck
SPI Vinyl Institute Legal Committee
SPI Vinyl Institute Health, Safety
and Environment Committee

VEV-145648