



A Division of The Society of The Plastics Industry, Inc.

cc: Rick Smith.
Dr. V.I.
(40)

Joe -
Part of the continuing
 saga of PVC being
 listed in the Senate
 air toxics bill.

Meredith

July 3, 1989

TO: Margaret Rogers

RE: "Event Reports" Basis for EPA Draft Acute Hazardous Events Database

As we discussed on Friday, I have begun researching the database on polyvinyl chloride and report the following information related to this effort:

1. Event Report - Page 107 (Oliver Brown Trucking) and Page 110 (Flexon Industries).

These two entries relate to a fire that occurred March 20, 1985 in a warehouse owned by the Oliver Brown Trucking Company. Oliver Brown occupied 10 percent of the warehouse space, with the remaining 90 percent leased to Flexon Industries. Briefly this was an arson fire in a building for which no certificate of occupancy had been issued for storage use. Also, the building's sprinkler system was not operational. Enclosed is a report on the fire written by then Deputy Chief Charles Angione of the Plainfield Fire Department. We have an extensive file on this fire, including the fire investigation report, news clippings, etc.

Presence of PVC: There was reportedly 90,000 square feet of scrap PVC material being held in storage for shipment to Flexon's manufacturing facility.

2. Event Report - Page 108 (Cedar Rapids, Iowa)

This fire occurred July 16, 1985 in an abandoned sewage plant that was being demolished. During the demolition process, a worker apparently using a torch started a fire.

Presence of PVC: There were PVC pipes in the treatment facility. Under operating conditions these pipes would have been underwater pipes.

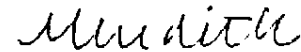
In both of these events, the Vinyl Institute, through retained counsel, had these fires investigated by trained investigative personnel. If you deem it necessary, additional documentation on these events could be secured. I could go further in investigating some of the other events relative to the PVC that appear in the Draft Database. However, it appears as though each of these events were begun by fires, with many materials in each of the structures. As you know, the majority of combustion products given off by PVC are the same as those produced by wood or more other common materials, both natural and synthetic. The one product given off by PVC that is not given off by natural materials is hydrogen chloride. Enclosed is a Vinyl Institute Technical Bulletin "Fire Properties of PVC", which may provide additional useful background.

It seems to me that the air toxics bills (S. 816, HR 2585) are not meant to address substances in fires -- if this were the case, everything from wood to cotton would also be listed!!

Relative to Vinyl Chloride, the events in the database are largely human errors that occurred in plants, equipment failures in plants, or rail accidents. I could research some of these with the VI member companies in the instances in which their companies are in the database. Suffice it to say, however, that vinyl chloride is already a regulated substance, and the assumption is that these events were properly reported.

Let me know how you wish to proceed with this issue as it relates to both EPA and the appropriate Senate/House committees. Personally, I believe it is important that the issue be clarified at the earliest appropriate time. If you would like us to draft an appropriate letter for your use on the Hill, please let me know.

Thanks for your help on this issue.



Meredith N. Scheck

CC: J. Ledvina