

① Mr. [signature]

② File

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cc: Mr. R. H. Sand
OSHA

T.D.
MAY 1 1974

April 26, 1974

Mr. T. McGrath
Society of Plastics Industry, Inc.
250 Park Avenue
New York, NY 10017

Dear Mr. McGrath:

Thank you for your telephone call this afternoon. I am pleased to forward a copy of our letter of invitation to certain selected companies concerning possible formation of an engineering task group to address the problem of control of airborne emissions as it relates to the joint impact of OSHA and EPA regulations.

As discussed, this group was formed concurrently with, or slightly in advance of, the SPI effort, and at its exploratory meeting unanimously agreed that it would prefer to operate as an arm of SPI in preference to other possible trade association affiliations. Doctor Everson and I are prepared to act as co-chairmen pro tem of the group until it can be organized and the chairmanship delegated to an individual whose work is more technical in nature.

Thank you for the opportunity to join SPI's OSHA subcommittee and to discuss the activities of our group with them.

Yours sincerely,

Warren S. Ferguson
Director of Occupational
Health and Product Safety

WSF:mn
Attach.

cc: Dr. Howard Everson

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ALLIED CHEMICAL CORPORATION

April 11, 1974

Dr. V. K. Rowe, Dow Chemical Corp. — *no show*
Dr. Douglas Rausch, Dow Chemical Corp.
Dr. Mayo Smith, Air Products
Dr. W. D. Harris, Uniroyal
Dr. W. L. Cox, Goodyear Research — *no show - told by counsel not to show w/o track record*
Dr. Z. G. Bell, Jr., PPG Industries
Dr. Howard Everson, Diamond-Shamrock Corp.
Dr. R. W. McBurney, Diamond-Shamrock Corp.
Mr. R. N. Wheeler, Union Carbide
Dr. M. Johnson, B. F. Goodrich — *no show - told by counsel not to go w/o track record*

Gentlemen:

As you know, OSHA requirements for vinyl chloride manufacture and use will in most cases require far higher standards of ventilation of work areas and of potential emission sources than has up to now been customary. In the near future, it is reasonable to expect that EPA will also establish emission standards designed to protect the general public from a newly recognized carcinogenic risk.

The current consensus of informal opinion seems to be that proven technology does not now exist for the removal of vinyl chloride from highly dilute air streams. It has therefore been suggested that a small group of knowledgeable companies involved in monomer production, polymerization, and/or conversion of polymer to finished articles meet to discuss the levels of performance we and our customers may be expected to meet, the technical options available to us in meeting these goals, and possible input to either OSHA or EPA with respect to such regulations. Suitable attendees would be an environmental manager, accompanied by one or more technical managers or specialists.

Because this meeting might lead to formation of a technical task force or a joint research proposal and I have been advised that such activity, unless done properly, could subject participants to a risk under the antitrust laws, an attorney familiar therewith will also be present.

Obviously, it must be understood from the outset that any findings developed would not be restricted to participating companies and that after the initial meeting, if formation of a technical task force seems appropriate, any other interested company may join in the

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effort. In addition, joint decisions to refrain from applying any particular technical option are also not permissible. It is further understood that there will be absolutely no discussion of costs of goods sold, prices, capacities, customer lists, and the like, or details of process technology.

The initial meeting will be held on Monday, April 22 at 10:30 a.m., Cleveland Airport at the Airport Hotel Hopkins in the David Copperfield "A" Room. This confirms earlier telephone contacts initiated by Allied Chemical and Diamond-Shamrock Corporations. We look forward to seeing you on April 22.

Sincerely yours,

W. S. Ferguson
Director of Occupational Health
and Product Safety

cc: Thomas D. Kent, Associate Counsel
John A. Wilson, Vice President & Secretary
Diamond-Shamrock

Mr. Wilson:

Mr. Kent informs me that you have kindly volunteered to supply a knowledgeable attorney to sit in on this initial meeting on April 22. Thank you for your cooperation.

W. S. F.

bcc: Messrs. Bowler
Callahan
Kent
Fedoruk
Quinn
Dr. Bruce E. Kurtz, Syracuse Tech Ctr
Mr. Bill Taylor, Diamond-Shamrock
1100 Superior Ave., Cleveland, Ohio 44114