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B. F. Goodrich Chemical Company

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July 2, 1975

Mr. John R. Lawrence
Technical Director
The Society of the Plastics Industry, Inc.
355 Lexington Avenue
New York, NY 10017

Dear John:

Arthur D. Little, Inc., under contract with the USEPA, met on June 30 in Brussels, Belgium with the Counseil Eruopean Federation of Industrie Chimique (CEFIC). The purpose of the meeting was to search out new and emerging technology for polymerizing vinyl chloride that could potentially impact on VCM emissions.

Those attending were:

A. S. Garnett - CEFIC - Brussels
Dr. Horst Wulf - CEFIC - Huls - Germany
Dr. Rudolf Praefke - CEFIC - Huls - Germany
Dr. John Stafford - CEFIC - ICI - London
P. DeVoogd - CEFIC - Shell - Hague
M. Boulerne - CEFIC - Solvay - France
M. Bonnefoy - CEFIC - Solvay - Belgium
Dr. Jack Milgrom - A.D.Little, Inc. - USA
R. W. Laundrie - SPI - USA
W. C. Holbrook - SPI - USA

The discussions of the meeting centered in three general areas:

1. Emerging polymerization technology - large polys, recipe reformulating, continuous polymerization, in-poly compounding, high conversion, etc.
2. Draft USEPA regulations and Industry-EPA cooperation.
3. European VCl regulations - worker exposure, emission and ambient, and food packaging.

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Food packaging standards have been established in some countries. Holland has a limit of 50 ppb extractable VCM per one liter bottle. There seems to be about 60 percent compliance throughout Holland. Belgium has a standard of 50 ppb extractable. France has no government standard but industry's policy is for less than 50 ppb extractable. The European Economic Commission has recommended a no detectable level using the most sophisticated analytical procedure. Apparently Germany and the United Kingdom have no food application standards.

CEFIC was appreciative of SPI representation at this meeting and encourage further close cooperation with U.S. industry. They expressed serious concern of the potential impact of USEPA VCM standards on their governmental authorities and eventually regulations applicable to them.

Respectfully submitted,

R. W. Laundrie / W. C. Holbrook
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R. W. Laundrie / W. C. Holbrook

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