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THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

250 PARK AVENUE • NEW YORK, NEW YORK 10017 • 212/573-9400

MINUTES

VCM and PVC PRODUCERS GROUP

Sheraton Park Hotel
Washington, D.C.

February 18, 1975
2:00 P.M.

Attendees:

Raymond Abramowitz, Hooker Chemicals, River Rd., Burlington, N.J. 08016
Ed Adwōn, Conoco, Box 2197, Houston, Texas 77043
J. T. Barr, Air Products, 656 Swedesford Rd., Wayne, Pa. 19087
Robert Brookman, Firestone, P.O. Box 699, Pottstown, Pa. 16464
G.W. Daigre, Dow Chemicals, P.O. Box 150, Plaquemine, La. 70764
J.M. Daniel, Robintech Inc., 1407 Texas St., Fort Worth, Tx. 76101
Fred C. Dehn, PPG Industries, One Gateway Cntr., Pittsburgh, Pa. 15222
Thomas Decker, Certain-teed Products, Swedesford Rd, Valley Forge, Pa
19042
J.E. Ertel, Robintech Inc., P.O. Box 2342, Fort Worth, Tx. 76101
John Floros, Great American Chemicals, 650 Water St., Fitchburg, Mass.
01420
G.L. Ford, Stauffer Chemicals, Westport, Connecticut 06902
D.H. Francis, Goodyear Tire & Rubber Co., 1144 East Market St.,
Akron, Ohio 44316
J.E. Hadley, Keller & Heckman, 1150 17th St., N.W., Washington, D.C.
20036
Jim Hanes, Dow, 2040 Dow Center, Midland, Michigan 48640
Robert Hill, Diamond Shamrock, 1100 Superior Ave., Cleveland, Ohio 44118
Jack Jaglom, Pantasote, 26 Jefferson St., Passaic, N.J. 07055
Milton Kline, Borden, 511 Lancaster St., Leominster, Mass. 01453
W.C. Koch, Allied Chemicals, P.O. Box 1139R, Morristown, N.J. 07960
David Kuhn, Conoco, Park 80 Plaza East, Saddle Brook, N.J. 07662
R.W. Laundrie, General Tire, One General St., Akron, Ohio 44329
A.B. Lindquist, Stauffer Chemical Co., Westport, Connecticut 06880
Cecil Loechelt, Ethyl Corp., P.O. Box 241, Baton Rouge, La. 70808
W.W. Madden, Firestone, Box 699, Pottstown, Pa. 19464
Dale Martin, Goodyear, 1144 E. Market St., Akron, Ohio 44236
Roy McCune, Pantasote, 26 Jefferson St., Passaic, N.J. 07055
H. T. McDevitt, Firestone, 1200 Firestone Pkwy, Akron, Ohio 44313
B. McNamee, Hooker Chemicals, 345 Third St., Niagara Falls, NY
Marshall Miller, Jones Day, 1100 Connecticut Ave., Washington, DC
R.S. Miller, Stauffer Chemicals, Dobbs Ferry, N.Y. 10522

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Attendees (Cont'd)

Thorley Mills, Jr., Firestone, 1200 Firestone Pkwy, Akron, OH 44317
James Murray, Union Carbide Corp., 270 Park Ave., NY, NY 10017
John Nelson, B.F. Goodrich Chemicals, 6100 Oak Tree Blvd., Cleveland,
Ohio 44131
D.C. Nuechterlein, Dow, 2040 Dow Center, Midland, Michigan 48640
H.A. Peed, Borden, 511 Lancaster Ave., Leominster, Mass. 01453
Frank Ritter, Tenneco, P.O. Box #2, Piscataway, N.J. 08854
Gerwig Robert, Concoco, Park 80 Plaza East, Saddle Brook, NJ 07046
P.E. Roggi, Stauffer Chemicals, Westport, Connecticut 06880
J.T. Ronan, Stauffer Chemical Co., Westport, Connecticut 06880
Mel Rosensaft, Great American Chemical, 650 Water St., Fitchburg, Mass.
01420
K.L. Schurter, Conoco, Park 80 Plaza West, Saddle Brook, N.J. 07662
J.C. Shiloff, Stauffer Chemical Co., Westport, Connecticut 06880
William Shumaker, Certain-Teed Products, P.O. Box 860, Valley Forge,
Pa. 19487
J.T. Smith, Covington & Burling, 888 16th St., N.W., Washington, DC
20006
K.L. Spalding, Shell Chemical, P.O. Box 2463, Houston, Tx 77001
Arthur Steele, Union Carbide, 270 Park Ave., New York, NY 10017
Leon Vernon, Conoco, Park 80 Plaza East, Saddle Brook, NJ 07662
A. Vittone, B.F. Goodrich, 6100 Oak Tree Blvd, Cleveland, Oh 44131
Todd Walker, Firestone, P.O. Box 699, Pottstown, Pa. 19606
Patricia Watson, Stauffer Chemical Co., Westport, Conn. 06880
Ray Wilkins, Ethyl Corp, 451 Florida St., Baton Rouge, La. 70801
J.E. Zimmerman, Diamond Shamrock, 1100 Superior Ave., Cleveland, Oh 4411

- 1 - Mr. Fath requested Walter Connolly to review the background and status of the draft Petition for a Writ of Certiorari that Firestone distributed. In turn Mr. Connolly called on his associate counsel Mr. Craig Mathews to present his views on the possibilities of succeeding in this effort.
- 2 - Mr. George Flint presented his company's view on the reasons not to proceed with the Petition for a Writ of Certiorari.
- 3 - Mr. Fath reported that the Steering Committee had voted 5 to 1 in favor of supporting the following motion:

"SPI should petition for a Writ of Certiorari on behalf of the member companies of the VCM and PVC Producers Group."

This motion was presented to the full committee for vote with a response of 12 yes, 6 no, 1 abstention and 2 not present.

Mr. Heckman indicated that he would proceed with the submission of a motion for a Stay of the Mandate with the Second Circuit Court and in the preparation of the Writ of Certiorari in cooperation with Firestone and Union Carbide.

4 - EPA Matters

Mr. Fath reviewed the background on the Society's decision to retain the firm of Ruckelshaus, Beveridge and Fairbanks as counsel on EPA matters. Mr. Ruckelshaus was introduced to explain the rationale for not meeting with EPA Administrator Train on February 19 as originally planned. He recommended that we proceed with the scheduled meeting with the EPA technical group in Durham, N. C. on February 25. It was the consensus of the group that this recommendation be followed.

- 5 - Mr. Robert Laundrie reviewed the results of the meeting of the EPA Committee that took place on February 11.
- 6 - Mr. Topol summarized the three basic options that might be used as the basis for the EPA vinyl chloride regulation as:

- 1) Material balance
- 2) Process check points
- 3) Area Monitoring

In the general discussion that followed it was recommended that the EPA be urged to recognize the interdependency of EPA and OSHA standards. The following opinions were likewise expressed:

- It will be desirable to correct the industry's original Section 114 data inasmuch as there have been many changes since the original reports were filed with EPA.
- It would be desirable to define and discuss the health issue with EPA. This might involve a joint government/industry health-effects program. (W. Ruckelshaus)
- The facts about the short half life of vinyl chloride probably need to be brought out in our further work with EPA.
- It was recommended that the point source control approach used in establishing the standard on mercury be considered as a precedent for using a similar approach for a vinyl chloride standard.
- It was urged that we be certain that the information presented to the EPA technical group at the February 25 meeting not waive any industry right to challenge EPA's authority to set standards on vinyl chloride.

- 7 - Mr. Topol suggested the following alternatives to a standard on emissions control:

- 1) number of pounds of vinyl chloride per hundred pounds of polymer
- 2) number of pounds of vinyl chloride from a point source per day
- 3) number of absolute total pounds of vinyl chloride from a plant over a specific time period.

(It was pointed out that alternatives 2 and 3 are nearly identical.)

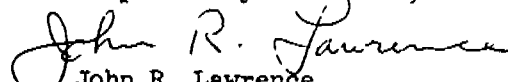
- 8 - The group spent a considerable amount of time developing a policy to be used to guide the discussion at the technical meeting with EPA on February 25 in the form of the "Recommended Guidelines for EPA Vinyl Chloride Regulations." (Copy attached)
- 9 - Mr. Tom Smith, B. F. Goodrich, Chairman of the SPI Distribution Committee's Ad Hoc Committee on VCM/PVC Labeling, reported on activities of his committee. The group has been successful in developing recommended standards for labeling shipments to conform with the OSHA Standard.

At the present time it appears that the only serious problem areas may be with less than truckload shipments and "break bulk" shipments overseas.

It was suggested that consideration be given to the possibility of going to OSHA for a discussion of possible changes in the labeling requirements at an appropriate time. This matter will be referred to the Lawyers Subcommittee.

- 10 - The meeting adjourned at 6:45 P.M.

Respectfully submitted,


John R. Lawrence
Technical Director

EPA-450/2-74-097

FB-237-343

NTIS

Sept. 1974

VCM and PVC PRODUCERS GROUP

Recommended Guidelines for EPA Vinyl
Chloride Regulation

We recommend that emissions be monitored on the basis of a composite of major point sources or by using in-process check points. Ambient air monitoring might be conducted to establish progress being made in reducing emissions. Material balance is not considered to be a useful control technique because it is too inaccurate a method to reflect the magnitude of the desired control.

In the control of emissions of vinyl chloride monomer there is a preference to establish controls on the basis of a composite of the major point source emissions to limit the number of pounds of vinyl chloride per 100 pounds of polymer produced or vinyl chloride produced in the case of monomer plants.

It will be desirable to have EPA consider the differences between the circumstances involved in the production of different types of resins and in the production of vinyl chloride monomer in establishing emission standards.

The EPA should recognize the time parameters required to develop, design and install the necessary emission control equipment for the different types of processes involved in producing monomer and polymers.

Direct EPA's attention to in-process monomer removal as an appropriate and effective means of reducing emissions.

Urge EPA not to consider the use of incineration, carbon adsorption or solvent absorption for the control of vinyl chloride monomer emissions in dilute streams in polymer plants.

Call EPA's attention to the fact that the industry is presently involved in many of the techniques cited under Case A on "Fugitive Controls" of the Proposed EPA Compliance Program.