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October 20, 1993

Re: Draft Letter to EPA on Greenpeace

Dear Frank:

REDACTED

SPI-07706

Carol M. Browner
Administrator (A-100)
United States Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Greenpeace Study of the Polyvinyl Chloride Industry

Dear Ms. Browner:

The Vinyl Institute, a division of The Society of the Plastics Industry, Inc., represents the majority of polyvinyl chloride (PVC) and vinyl chloride monomer (VCM) manufacturers in the United States. We recently learned of an April 23, 1993, letter sent to you by Greenpeace International. The Greenpeace letter alleges that environmental problems are being created by the release of dioxins and other organochlorines from the production of polyvinyl chloride. We wish to correct certain misleading and unsupported assertions in the Greenpeace document "Dioxin Factories: A Study of the Creation and Discharge of Dioxins and Other Organochlorines from the Production of PVC," which was sent to you.

Because accurate information about the PVC industry and the potential health risks associated with PVC manufacturing is necessary to make sound regulatory decisions, the Vinyl Institute commissioned an independent study of the Greenpeace report. The ChemRisk study details numerous factual errors and unsupported allegations in the Greenpeace report and provides accurate information about the PVC industry.

In addition to the ChemRisk study, we also enclose an August 18, 1993, press release from the Norsk Hydro Plant in Rafnes, Norway, revealing the results of an exhaustive study of dioxin emissions during the manufacture of vinyl chloride at that plant. The 1993 Norsk Hydro study calls into question the very data cited in the Greenpeace report, and shows that actual emissions from the Norsk Hydro plant in Norway are far lower than the those cited by Greenpeace.

The vigilance of the U.S. Environmental Protection Agency together with concerted efforts by U.S. PVC manufacturers have made the United States' PVC manufacturing industry one of the safest and cleanest in the world. We are proud of the progress we have made over the last two decades. PVC production is an essentially closed process which serves as a leader in emissions reduction and waste minimization. Existing U.S. EPA and state

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regulations govern the release of vinyl chloride to the air, water and soils, impose stringent controls on workplace exposure to vinyl chloride, and require the installation of advanced pollution control equipment at vinyl chloride and PVC manufacturing facilities.

The Greenpeace report is dangerously misleading because its conclusions are based on several incorrect fundamental assumptions. Greenpeace asserts that the PVC industry is a "major new dioxin source" and implies that the dioxin produced by the PVC industry will add significantly to dioxin in the environment. Greenpeace wrongly assumes that because large amounts of chlorine are used in PVC production, large amounts of dioxin necessarily are produced as wastes. Greenpeace's conclusions are based on four fundamental, but flawed, assumptions.

(1) Greenpeace assumes that analytical data from a single vinyl chloride monomer (VCM) facility are representative of data from all VCM/PVC facilities. Much of the Greenpeace report is based on analytical data from a single vinyl chloride manufacturing facility: the Norsk Hydro plant in Rafnes, Norway. Greenpeace extrapolates data from a 1989 survey of dioxin emissions from this plant and applies the data to the entire universe of PVC manufacturing facilities. The 1989 data from the Norsk Hydro plant is not characteristic of industry-wide emissions on a global scale because production processes and emissions control technology differ materially at individual facilities. Greenpeace ignores the emissions control technology and regulatory emissions limitations on all vinyl chloride and PVC facilities in the United States.

(2) Greenpeace assumes that generation of dioxin during VCM manufacturing is synonymous with the release of dioxin into the environment. Greenpeace mistakenly correlates the incidental production of dioxin with the release of dioxin and alarmingly asserts that "manufacture of PVC may be the world's largest single source of dioxin." This statement is without justification or support. PVC manufacture is neither a large source of dioxin production, nor a large source of dioxin emissions into the environment. Very little dioxin goes into wastes, and an even smaller amount is released into the environment. - For example, data recorded in 1993 at the Norsk Hydro facility in Rafnes, Norway indicate that while 6.6 grams of dioxins were produced during the manufacture of 425,000 metric tons of VCM, only 0.025 grams were emitted to the atmosphere and 0.006 grams were emitted to the water. Greenpeace ignores countless other sources of dioxin emissions into the environment, and overlooks several independent studies that conclude that non-point source emissions from automobiles and other internal combustion engines are a major source of dioxin emissions into the environment.

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