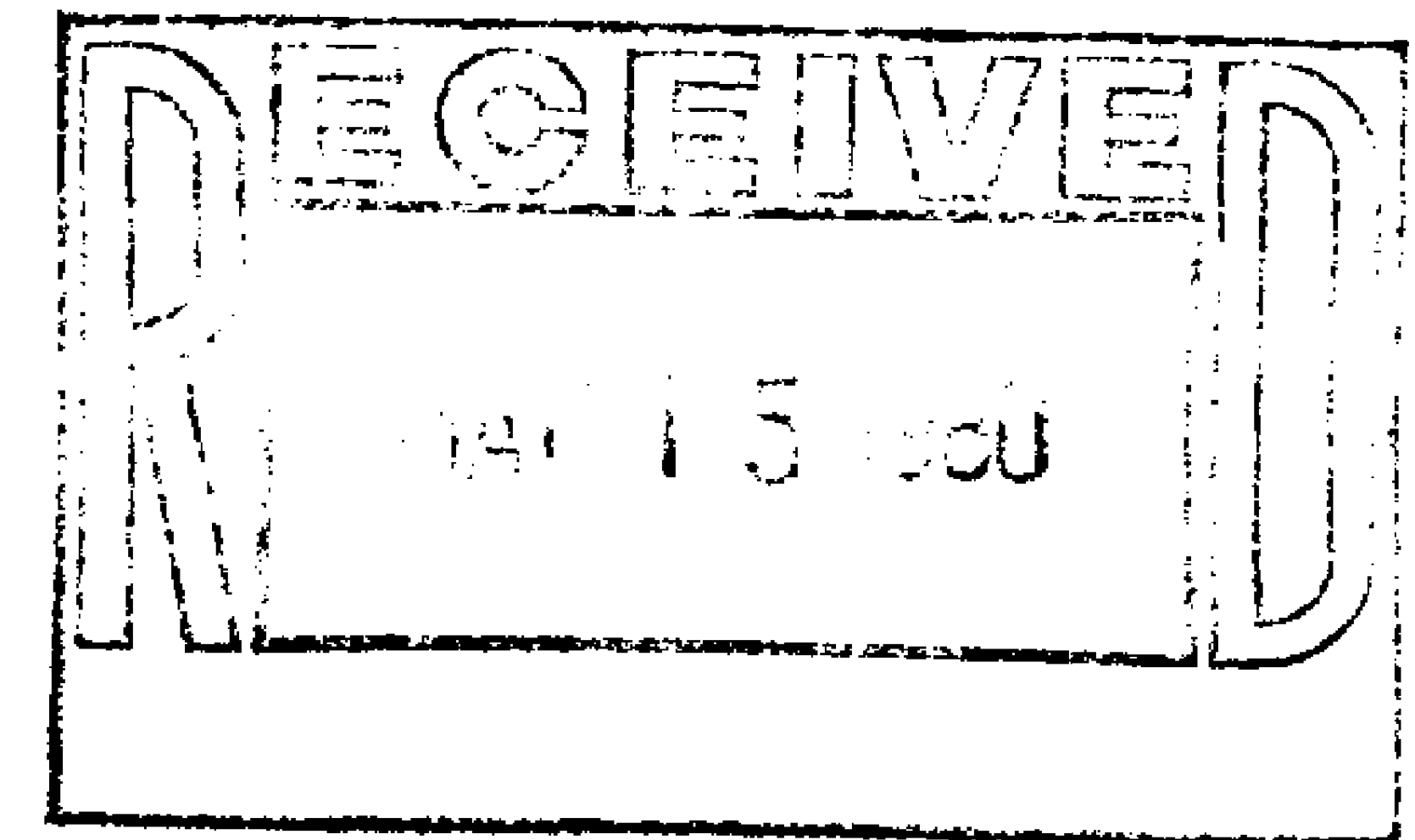


Interoffice Communication

TO: DISTRIBUTION
FROM: H. R. Flammer
DATE: May 12, 1980



SUBJECT: SPI PVC Safety Committee - Steering Committee Meeting
April 30, 1980

The steering committee consists of members from Conoco, Diamond, Goodrich, Dow, Shell, Pantasote, Air Products, Tenneco and Stauffer. Each company serves a three-year term and is rotated out. We will serve until 1983.

The meeting covered the following:

1. A proposal was made to have a central computerized clearinghouse for all toxicological and epidemiological papers so that member companies would have ready access. This will also tie the U.S. and European lists. \$18M was approved.

2. EPA Compliance. The proposed EPA regulations issued in 1978 have been officially withdrawn. Any new regulations would have to again proceed through public hearings. The EDF has submitted a letter to the EPA asking for:

A) Enforcement of contained emergency VCM discharge. They have asked for the EPA to impose a set of fines on offenders.

B) A lowering of stripped slurry levels below 400MM PPM. While most companies can strip to below 50 PPM, none can do it constantly. It was the consensus of the committee that legal council propose that it would be on a strip wire basis.

The EPA has not responded to the EDF on their request as of yet and is not expected to make any new moves short term until their court cases on "cease and desist" orders with Tenneco and Pantasote are resolved.

Both the EDF and EPA now agree that fugitive emissions are uncontrollable and won't be part of any new standards.

The EPA has hired Radiant Corporation to do a study on gas holders as a plausible technology to eliminate emergency discharge.

The EPA is now estimating that the industry will spend \$750MM on maintenance and operating costs to meet EDP regulations between 1978 and 1986. The committee studies show that from 1974 to 1979, \$377MM in capitol and \$122MM were actually expended. Several members felt that we should take the offensive

with the PVC/VCM experience as a case study. "Regulations were implemented, the job was done, but the increasing noose of regulations tightened further with no benefits." A subcommittee was named to develop a regulatory strategy which could provide input into congressional control of the regulatory bodies.

Additional data gathering of ambient air studies was suggested for VCM.

A white paper will be written on PVC dust. Additional data needs to be gathered on ambient air quality. The VCM level in airborne dust needs to be determined as well as medical records including chest x-rays or other lung examinations.

The EPA's regulations on hazardous waste, its transportation and disposal should be issued by the end of this week,

EPA will investigate the hazards of phthalate plasticizers. It is believed that sheering or Ciba Geigy was refused permit to begin production of linear alcohol terminated phthalate polyesters.

3. OSHA - May 9th was the deadline on comments for the OSHA VCM/PVC dust investigation.

4. Fire Safety - Phosgene has been found after igniting PVC through use of an electric arc, but not other burning mediums. The Fire Marshalls Association has agreed that the amounts present don't represent a significant hazard.

Dues of \$250M for the coming year were approved.

The next meeting will be about three months or as circumstances dictate. Handouts are attached.

HRF

H. R. Flammer

HRF:smb

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