

DELAIDE • AMSTERDAM • ANCHORAGE • AUCKLAND • BRUSSELS • BUENOS AIRES • CHICAGO • COPENHAGEN • DUBLIN
GOTHENBERG • HAMBURG • LEVÉS—U.K. • LUXEMBOURG • MADRID • MONTREAL • NEW YORK CITY • OSLO • PALMA DE MALLORCA
PARIS • ROME • SAN FRANCISCO • SAN JOSE—COSTA RICA • SEATTLE • STOCKHOLM • SYDNEY • TORONTO • VANCOUVER • VIENNA
WASHINGTON • ZURICH

GREENPEACE

Greenpeace • 1436 U Street NW • Washington DC 20009 • Tel (202) 462-1177
Tlx 89-2359 • Fax (202) 462-4507

April 23, 1992

Ms. Carol Browner
Administrator (A-100)
U.S. Environmental Protection Agency
401 M. Street SW
Washington, DC 20460

Dear Ms. Browner:

New data from several studies by European governments indicate that huge quantities of dioxin and related compounds are produced in the manufacture of feedstocks for the plastic polyvinyl chloride (PVC). Assuming that the facilities studied are representative of other plants -- including those in the U.S. -- manufacture of PVC may be the world's largest single source of dioxin. (To our knowledge, the only dioxin source that would rival PVC production would be incineration.) These data are summarized in the enclosed report, "DIOXIN FACTORIES: A Study of the Creation and Discharge of Dioxins and Other Organochlorines From the Production of PVC."

Dioxin, related compounds, and other highly toxic organochlorines were found in very large quantities in air emissions, water discharges, and wastes from the production of ethylene dichloride and vinyl chloride, the monomers from which PVC is produced. Currently, the bulk of the wastes from these processes are burned in incinerators that are not licensed to burn dioxin-contaminated wastes.

This information has extraordinary implications for health and the environment in the U.S. and for EPA regulatory policy in particular. As you are aware, your agency is currently engaged in a re-evaluation of the health and environmental threats associated with dioxin pollution of the environment. To date, that effort has revealed the following:

- * Dioxin contamination and human exposure are ubiquitous in the U.S.;
- * There appears to be no safe dose for many of dioxin's health effects;
- * Current exposures for the general U.S. population are in the range at which reproductive, developmental, immunological, and carcinogenic health effects are likely to occur. The revelation of a major new dioxin source is thus of profound import in the development of EPA's policy and information on

CTL014675

dioxin sources in general and in the permitting of specific facilities. For instance, EPA is currently considering permitting the construction of one of the world's largest new PVC-feedstock facilities, owned by Formosa plastics, in Point Comfort, TX.

We are thus requesting U.S. EPA to take the following actions:

- * Launch an investigation of the production of undesired organochlorine by-products -- including dioxins -- in the manufacture of PVC chemical feedstocks. The results of these tests should be published and released, and should include data on quantities of organochlorine by-products formed and released through all potential discharge pathways.
- * Include this information in the source identification effort in the agency's ongoing dioxin reassessment;
- * Inform the communities surrounding these facilities of the likelihood of previously unknown dioxin exposures and the possibility of serious threats to public health;
- * Declare a moratorium on new or expanded EDC/VCM/PVC facilities, until all questions relating to releases of and exposures to organochlorine by-products are resolved;
- * Immediately classify wastes from the production of PVC feedstocks as dioxin-containing wastes and require their disposal in facilities licensed to handle them;
- * If the European results are confirmed for U.S. facilities, formulate plans for the phase-out of existing PVC-feedstock production facilities.

Because of the extraordinary health implications of this information, we request an expedited reply. Thank you for your attention to this matter, and do not hesitate to contact us for further information.

For the Earth,

Pat Costner
Research Director
US Toxics Campaign

CTL014676