

PVC SAFETY GROUP

ALTERNATIVES COMMITTEE

Keller & Heckman Offices
WASHINGTON, D.C.

Friday, December 5, 1980
10:00 A. M.

S U M M A R Y

- 1 - Draft contingency plans as assigned at the October 9 meeting were reviewed for content and consistency.
- 2 - SPI staff and legal counsel will edit the draft contingency plans to provide uniform format and consistency.

These edited drafts will be reviewed by the Alternatives Committee in late January or early February prior to submission to the PVC Safety Group's Steering Committee.

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ATTENDEES:

William C. Becker - ACTING CHAIRMAN - B. F. Goodrich Company, 6100 Oak Tree Blvd.
Cleveland, OH 44131

Gary H. Baise - Beveridge, Fairbanks & Diamond, 1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

John T. Barr - Air Products & Chemicals, Box 538, Allentown, PA 18105

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SPI-11952

1. Mr. Becker, Acting Chairman, opened the meeting with self introductions and suggested that each of the draft contingency plans be reviewed.

2. Clean Air Act -

After considerable discussion, it was agreed that the following three items be added to the original four Anticipatory Action Underway items:

- Assessment of existing standard in terms of whether it is needed from a public health standpoint.
- Determination of cost of continuing existing standard through 1986 in light of EPA's estimate.
- Identify targets in government and congress to which industry views should be made known.

3. The Resource Conservation and Recovery Act (RCRA)

Mr. Ford reviewed his RCRA contingency plan. He pointed out possible problems with respect to VCM appearing in mixture systems.

4. Clean Water Act (CWA)

In discussing the CWA activities, the newly available EPA Vinyl Chloride Water Criteria Document was distributed. It was agreed that Keller & Heckman should attempt to determine how EPA plans to use this document and how comments and corrections can be submitted. It was further suggested that the PVC Health Committee should review this new criteria document.

5. General

It appears that all of the contingency plans might be supplemented to present an action plan in the event that there is no regulatory action or a significant delay in the present review process.

Mr. Becker suggested that some consideration be given to monitoring pre-emption activities by states which would place additional compliance burdens on the industry. He also suggested special attention be given to alternatives in combustibility issues.

Other suggested issues that might be considered were cited as transportation and labeling.