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AMERICAN
DEPARTMENT

Vinyl chloride
UNIROYAL CHEMICAL
Division of UNIROYAL, Inc.
Elm Street
Naugatuck, Connecticut 06770

(203) 723-3817

January 13, 1982

Dr. Carol Stack
Chemical Manufacturers Association
2501 M Street, N.W.
Washington, D.C. 20037

Dear Dr. Stack:

Re: Vinyl Chloride Program Panel

Dr. Walter Harris and I have read through the several packages of information you have sent over the past 6 weeks. We have only a few comments which I am sending to you since neither Dr. Harris nor I can attend the meeting scheduled for January 27, 1982.

1. The latest proposal of EHA to have a 2-phase study with Phase I being a complete entity and Phase II negotiated and funded as a separate step seems like a reasonable answer to the concerns expressed in earlier memos. Early completion is not so critical as to have it done correctly and without excessive costs.
2. The only other problem would appear to be the difference between the wording at the first paragraph of section 25: "to the satisfaction of CMA" vs. "in a manner customary in similar reports." It would seem that this should be resolved especially with the discussion of intent which appears in the second paragraph of this section.
3. Since a mutually satisfactory agreement appears to be so close, we encourage the Vinyl Chloride Panel to recommend that the CMA staff try to resolve the remaining problems with EHA so that this important program can proceed.

URL 15585

Dr. Carol Stack

January 13, 1982

Please continue to keep Dr. Harris as the primary contact on these matters. He will advise me as he feels it is required.

Thank you for the opportunity to offer these comments.

Very truly yours,

Benton R. Leach
Director
Environmental Affairs

cc: WDH
BRL
Chrono

URL 15586