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ISSUES MANAGEMENT COMMITTEE

Following is the SPI staff report on IMC activities for the period June 1, 1985 through May 31, 1986. This report is part of the Briefing Book for the SPI Board of Directors meeting scheduled for May 28-30.

A brief summary of issues of interest to the Vinyl Institute Executive Board will be made at the VI meeting.

STAFF REPORT TO THE ISSUES MANAGEMENT COMMITTEE

Activities and Accomplishments for 1985-86

The past year has been one of considerable transition for the staff and committees for which the Issues Management Committee is responsible. The staffs of the Public Relations Department and the Technical and Public Affairs Department have been reorganized and relocated from New York to Washington, with new personnel occupying all but one of the positions. In fact, of the 17 persons composing the IMC staff, 10 are new since July.

Transitions, moves and reorganizations notwithstanding, the 1985-86 year has been one of considerable accomplishment in the issues management area for the SPI. In all areas, significant objectives have been achieved and worthwhile services provided to the SPI membership. All has been done within the budget.

Individual reports for Public Relations, Federal Government Affairs, State Government Affairs, and Technical and Regulatory Affairs follow, as well as information about the IMC staffing as of May 1. Set forth below are brief reports on IMC activities over the past year on international trade and transportation.

A major activity on which the SPI has embarked in mid-1986 that is not covered by other reports is the organization of an inter-industry coalition to develop better information on the plastics dimension of the solid waste issue. An April 1 organizational meeting drew representatives from packaging companies and associations involved in packaging, food processing and retailing, and packaging materials. Among companies that attended and that will be represented on the coalition's steering committee are member and non-member companies of SPI, as well as allied associations.

International Trade

The IMC created last July a new subgroup, the International Trade Affairs Committee, in response to growing interest in and concerns about international trade issues. The Committee is principally composed of representatives of SPI's operating divisions with concerns about trade. Its charter is to serve as an advisory group to staff on trade matters, provide a forum for association operating units to discuss trade issues, and develop trade policy proposals. After an October 31 organizational meeting, the Committee met on January 8 and began the task of reviewing trade areas worthy of association policy. A SPI policy on U.S.-Canada trade talks was developed at that meeting and subsequently approved by the Board of Directors.

A study of plastics import and export trends, updating an October, 1984 review, was commenced in April for presentation at a May 27 ITAC meeting, and the Processors and IMC Committees that meet respectively on May 28 and 29. Additionally, contacts with Department of Commerce and International Trade Commission officials with trade responsibilities concerning plastics has been increased in recent months and will be maintained on a higher level of frequency over the next year.

Transportation

Staffing for the Committee on Transportation and Distribution was transferred to Washington in June and assumed by the IMC staff, specifically Marina Brockmann. The Committee monitors, on behalf of the entire industry, transportation developments and provides comments and actions to make sure the industry's interests are represented in regulatory and legislative forums. Among major accomplishments during the past year were these:

- Conducted the annual distribution cost and customer service database survey in June.
- Developed an SPI position paper on the Staggers Acts of 1980 to provide policy guidelines for the association should Congress consider amendments to it.
- Submitted statements to appropriate congressional committees regarding the disposition of Conrail.

- Prepared and distributed a Directory of Rail-to-Truck Dry Bulk Plastic Transfer Services in September. It serves as a quick reference to facilities that are specifically known by the plastics industry to handle dry bulk plastics.

- Continued involvement with relevant coalition efforts such as the Hazardous Materials Council and the 60 NR Committee.

- Filed SPI comments on four occasions with the Interstate Commerce Commission on proceedings addressing issues concerned with competitive access to rail services.

April 25, 1986

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SPI
ISSUES MANAGEMENT STAFF

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Marina Brockmann, Coordinator, Special Issue Projects
Brigid Donnelly, Administrative Assistant

TECHNICAL AND REGULATORY AFFAIRS DEPARTMENT

Pat Toner, Director of Technical and Regulatory Affairs
Dennis Burgess, Project Coordinator, Technical and
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Barbara Lobianco, Secretary

PUBLIC RELATIONS DEPARTMENT

Ron Bruner, Director of Public Relations
John Graham, Manager, Internal Communications
Susan Vadney, Coordinator, External Communications
Thomas Southall, Secretary

FEDERAL GOVERNMENT AFFAIRS DEPARTMENT

Margaret Rogers, Director of Federal Government Affairs
Margaret Rita, Federal Government Affairs Analyst
Secretary (Vacant)

STATE GOVERNMENT AFFAIRS DEPARTMENT

Roger Bernstein, Director of State Government Affairs
Ken Lane, Assistant Director of State Government Affairs
Cyndi Willett, State Government Affairs Analyst
Natasha Neal, Secretary

April 28, 1986

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Public Relations Department Report

1985-86

Major changes in SPI's Public Relations Department have been instituted over the past 10 months, including relocation of the department to the Washington, D.C., headquarters, the hiring of three new people there, phasing out of external public relations agency assistance, and reorganization of the IMC PR Committee to provide broader representation for the Operating Units.

Significant amounts of time have been spent since last summer on the issues of Combustibility and Solid Waste/Recycling as well as improving departmental liaison with the Operating Units. Outlines for communications plans were developed and refined with PR Committee assistance in the areas of Positive PR, Combustibility and Solid Waste/Recycling.

Highlights of departmental activities over the past 10 months include:

Combustibility

Distribution of the film, "Fire Safety in America," throughout the SPI network, including sales of more than 100 copies to members and establishment of a loan program to the fire-safety community.

Major media effort in August/September in response to press offensive by International Association of Fire Fighters. Action taken included some 30 media briefings/interviews in a seven-day period, culminating in an appearance by Pat Toner on the NBC Today Show.

Provided media support in connection with series of hearings throughout New York State on small scale combustion toxicity testing proposal.

Developed internal staff procedures for handling major fire disasters involving plastics.

Co-ordinated responses to various attacks on the fire safety of plastics, ranging from letters to the editor of publications to special briefings.

Developed and distributed via satellite to TV stations nationwide a news feature on the importance of sprinklers and smoke detectors in connection with National Fire Prevention Week; also sent news release to all daily newspapers.

Solid Waste/Recycling

Department provided public relations services and counseling to the Plastics Recycling Foundation, including development of materials and a slide presentation for the Foundation's membership development efforts.

Coordinated media coverage of dedication ceremonies for the Plastics Recycling Center at Rutgers; produced and distributed via satellite a video news release to television stations nationwide on the Center; produced radio actuality that went to 500 stations nationwide; also sent news release to all daily newspapers on dedication. (As result of Video News Release, Cable News Network did followup piece in April 1986.)

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Other Issues

DEHP - Coordinated with Chemical Manufacturers Association on media responses to Chronic Hazard Advisory Panel's (CHAP) report to Consumer Product Safety Commission on plasticizer DEHP; prepared materials for use in response.

Paperboard Packaging Council - Handled media inquiries stemming from judge's decision in SPI suit against PPC; developed response plan and associated materials for use in responding to renewed PPC campaign.

Plastic Grocery Sack Council - Provided public relations counsel and liaison to Flexible Packaging Association's new Plastic Grocery Sack Council for its public relations program.

Attack on Polyethylene Containers - Worked with Plastic Drum Institute to develop appropriate response to attack by Deborah Wallace and associates on safety of polyethylene containers.

Media Relations

During the past 10 months the department has fielded more than 200 inquiries from newspapers, radio stations and television stations, including the networks.

Noteworthy print media articles include:

<i>New York Times:</i>	"'New Frontier' in Plastics" (8/1/85) "Selling Plastic for its Quality" (1/28/86) "The Future May Again Be in Plastics" (3/24/86)
<i>The Washington Post:</i>	"Plastics Pushing Bottles, Cans Off Shelves" (8/25/85) "Concern Over Plastics Called Premature" (10/9/85)
<i>U.S. News & World Report</i>	"The High Tech World of Plastics" (2/24/86)
<i>Smithsonian:</i>	"On land, at sea and in the air, those polymer invaders are here" (Nov., 1985)
<i>Republic (Airline In-Flight Magazine)</i>	"Plastics. There's a great future in it." (Dec., 1985)
<i>The Pittsburgh Press</i>	"How dangerous are all those plastic products in the home?" (12/8/85)
Syndicated Columnist Joyce Lane Kennedy (100+ newspapers)	"Super' plastics polish high-tech image and offer durable job chances" (Jan., 1986)

Some 60 news releases were prepared and released, in most cases to the trade media, during the 10-month period.

Year-end statistical briefing and luncheon held for trade media in December.

Monthly release on resin statistics to major business and trade publications instituted.

Mini-publicity campaign developed and implemented for Michigan Chapter on "Plastics Week in Michigan," including radio actuality feeds to 75 stations featuring Michigan governor as well as news release to all daily and weekly newspapers in the state.

Copy for 10 monthly "Plastics Issues" columns written and submitted for publication by SPE's *Plastics Engineering* magazine.

Publications

Developed and instituted new quarterly publication, "*SPI President's Report to The Members*," starting in October 1985.

Redesigned *Plastics News Briefs (PNB)*, *Washington Memo*, *State Reporter* and *Industrial Relations Newsletter (IRN)* using near-typeset capabilities of new, in-house laser desk-top printer to improve readability and professionalism of publications. Twenty-two issues of PNB written and produced; three issues of IRN edited and produced.

Handled production of *Molder's News* (2 issues) and *PlasMed News* (1 issue) for operating units.

Wrote, designed and produced brochure for Membership Department on "*SPI Government Affairs -- And You*" as well as one entitled "*It's Yours: Display It Proudly*," promoting use of SPI Member logo.

Wrote and/or produced, in many cases using in-house computer capabilities, nearly 25 brochures, bulletins, and other publications.

Other Highlights:

Prepared texts for eight major speeches by SPI President, plus miscellaneous "remarks."

Initiated opinion research survey of four major special audiences -- fire chiefs, solid waste officials, community leaders and environmental editors/writers -- for use in planning communications activities.

Maintained liaison with, and attended meetings of, Communications Committees of major operating units (Polyurethane Division, Vinyl Institute and Plastic Bottle Institute), as well as provided continuing public relations counsel to other operating units as needed.

Upcoming Plans for 1986-87

Beyond daily routine of handling media inquiries, newsletters, speeches, publications and general PR counseling, special attention will be devoted to:

Implementation of communications plans in the areas of Solid Waste/Recycling (coordinated effort between IMC, PBI and new Solid Waste Coalition), Combustibility, and Positive PR to the extent possible with existing staff levels.

Development of media training module for use in dealing with Solid Waste/Recycling and Combustibility issues.

Readership survey of *Plastics News Briefs*, *Washington Memo*, *State Reporter* and *Industrial Relations Newsletter*, including an effort to update and cull mailing lists.

Revision of the "Story of the Plastics Industry" publication.

Instigation of in-house newsletter writing/production service for various operating units as a cost-reduction measure for them, if staffing is provided.

Further development of PR objectives in Strategic/Operating plans, consistent with staff availability.

Development of appropriate publicity in conjunction with SPI's 50th Anniversary celebration.

Assumption of writing/editing/production of various publications (Member Services Guide, Literature Guide, etc.) formerly handled outside the department.

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Federal Government Affairs Department Report

1985-86

Oil Import Tax

When the oil import tax issue heated up on Capitol Hill in January 1986, staff spent a major portion of time over a couple of months lobbying against its adoption. Staff drafted testimony, working with other petrochemical representatives, for presentation before the Senate Finance Committee and a joint subcommittee hearing of the House Energy and Commerce Committee. Staff met with Senators, or their legislative staff, who sit on the Senate Finance, Energy and Budget Committees discussing SPI's basis for opposition to an oil import tax. Staff also sent correspondence to members of the House Ways and Means and Budget Committees outlining SPI's opposition. Staff helped coordinate and participated in a press conference of a business coalition to announce opposition to an oil import tax.

Environment

- Superfund

During 1985 and into 1986 staff met with members of the House and Senate and their staff, and also submitted letters to other relevant members of Congress outlining SPI's position on Superfund issues addressing the size of the fund, clean up standards, community right-to-know requirements, and liability. SPI staff also advised members of the Senate Finance and House Ways and Means Committees of our support of a broad-based tax as the appropriate financing mechanism for the fund and submitted comments to each committee. Both Committees approved broad-based funding; however, the Ways and Means Committee proposal overturned on the House floor with a provision requiring reliance on a greater feedstock tax. SPI staff is continuing to advise House and Senate Superfund conferees of its support for a broad-based tax and of reasonable community right-to-know requirements.

- New Source Performance Standards for Plastic Parts - Business Machines

Staff attended Environmental Protection Agency public hearing in North Carolina on draft New Source Performance Standards designed to control emissions of volatile organic compounds (VOCs) from the coating of plastic parts for business machines. Staff continued liaison with EPA and recently, coordinating with the SPI Structural Foam Division, submitted comments on proposed New Source Performance Standards.

- Hazardous Air Pollutants

Staff worked with SPI technical staff and SPI staff directors to develop direct and downstream uses in the plastics industry of those substances listed in Rep. Henry Waxman's (D-CA) "hazardous air pollutant" control legislation introduced early in 1985. The list was used to produce a final comprehensive document. It will be used as a lobbying tool when the issue re-emerges on Capitol Hill. The purpose of the document is to show members of Congress the relationship between chemicals and everyday products used or produced in their districts and states.

- Underground Storage Tanks

Staff began working with EPA staff and participated in meeting in May 1985 with EPA technical staff and representatives of SPI RP/CI to inform the agency of the technical capabilities of reinforced plastic tanks. Staff continued liaison with EPA regulatory staff hosting a series of meetings at SPI with EPA staff responsible for developing underground storage tank regulations under the Resource Conservation and Recovery Act (RCRA), the federal hazardous waste law. Staff also arranged and participated in meeting with representatives of members of RP/CI division in April, 1986 with EPA technical staff to address technical capabilities of reinforced plastic storage tanks for hazardous waste. The meeting was an attempt to correct questionable information given to the agency by representatives of the steel tank industry. Plastic pipe producers also participated in the meeting with EPA.

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- Hazardous Waste Requirements

Staff worked with technical and public relations staff to produce SPI Special Bulletin on manifest requirement of Resource Conservation and Recovery Act (RCRA). The requirement to use manifest for shipping small quantities of hazardous waste impacts many SPI members.

OSHA and EPA Regulatory Compliance Seminars

Staff devoted a significant portion of time from mid-September to early November developing and producing materials for distribution at and participating in SPI Occupational Health and Environmental Issues Committee (OHEIC) compliance seminars on the OSHA Hazard Communication Standard and the EPA Resource Conservation and Recovery Act (RCRA) hazardous waste regulations. Staff attended seminar in Atlanta on October 10-11, and functioned as seminar moderator in Los Angeles on October 15-18, Chicago on October 28-29, and Newark on November 4-5.

Staff wrote "wrap up" report of the OSHA and EPA compliance seminars addressing attendance, economics, staff time and overall value to members. "Excellent" was the overwhelming opinion of the seminars according to seminar response forms and the personal comments at the individual seminars. A Hazard Communications Manual was prepared for use with the EPA Seminar and has been sold separately.

Product Liability

In April 1986, staff participated in a roundtable discussion in Massachusetts for members of the SPI New England Division on the product liability crisis and its impact on plastics industry. Staff described the role of SPI in the product liability issue over the years and ongoing activity on Capitol Hill and in state legislatures.

Staff also coordinated speakers and participated in *Plastics World* product liability roundtable discussion on April 22. The discussion will serve as the basis for a special feature planned for the August publication. Representatives of the various segments of the plastic industry described their personal situations with product liability insurance and lawsuits. Representatives from the insurance industry and Capitol Hill provided those perspectives.

1986 SPI Government Affairs Issue Survey

Staff coordinated with other Issues Management Committee staff and SPI staff directors to develop comprehensive 1986 government affairs issue survey. The survey was mailed just before Thanksgiving to the over 1800 SPI voting representatives. More than 550 responses were received. Staff tallied the responses, with assistance from other departments. The following issues were shown to be the highest level of interest to the membership: Liability Insurance-Obtaining; Product Liability Tort Reform; Right-to-Know - Employee and Community; Tax Reform; Budget Deficit/Federal Spending; Hazardous Waste Regulation; Energy Taxes; Victim's Compensation from Chemical Exposures; Multilateral Trade Negotiations; U. S.-Canada Trade Talks and Devaluation of the Dollar.

Staff also prepared draft 1986 federal issue agenda for approval by the IMC.

SPI Government Affairs Manual

In August, staff updated the SPI Federal Issues Manual. During February and March, staff developed and expanded, with cooperation of other IMC staff, an SPI Government Affairs Manual which includes a more comprehensive listing and explanation of major issues for the plastics industry, federal and state; an expanded regulatory update, and basic government affairs background information.

Solid Waste - Degradability

Staff organized initial meeting in March, 1986, with the staff of Sen. John Chafee (R-RI) to discuss photo- and biodegradability of plastic and the extent to which such technology is available. Representatives from member companies participated in the meeting along with SPI staff. Additional contact with the Senator's staff continues, as consideration is being given to the introduction of legislation on the subject.

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Congressional Reception for SPI May 1986 Board Meeting

SPI arranged for congressional reception which is to be hosted May 28 by the SPI Board of Directors, a White House Briefing for the Board and a congressional speaker for a Board luncheon. Staff is coordinating with the Board of Directors and the Federal Government Affairs Committee to achieve a successful turnout.

Food, Drug and Cosmetic Packaging Committee

Staffing for the committee was transferred to Washington in June and assumed by the Federal Government Affairs staff. Successful meetings were conducted in June in Washington and December in Florida. The committee continues to be the resource for SPI's policy positions on food packaging matters pending before the Food and Drug Administration and the Congress.

Federal Government Affairs Committee

The committee's activities resumed last Fall after the untimely death of its long time chairman, Bob Buehler of B. F. Goodrich. The committee, which serves in an advisory role for the association's federal lobbying activities, has grown to some 20 Washington Representatives of member companies. A new chairman is expected to be appointed by June.

Future Plans

The continued expansion of the SPI as a voice of the plastics industry on Capitol Hill will be a major goal for the coming year. More frequent congressional contacts and testimony on relevant issues will be made. Further work will occur on increasing member company involvement in issue contacts with Members of Congress. The new Government Affairs Manual will be updated every six months and special bulletins on major issues will be prepared when appropriate.

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State Government Affairs Department Report

1985-86

Although many attempts were made, no legislation adversely affecting the plastic industry passed a state legislature during FY '85-86!

Combustibility

1985 was considered the "year of combustibility" for SPI. Several states -- New York, Massachusetts, Maine, Maryland, Arizona, Indiana, Oklahoma, and California -- considered legislation aimed at forcing the plastics industry to test building products and furnishings for combustion toxicity. State affairs staff has been successful in defeating this anti-synthetics movement in all states, and has slowed progress in New York started its push for toxicity regulations in 1983. In Massachusetts, Maryland, and Oklahoma, where study groups were formed as a compromise between industry and proponents of anti-synthetic combustion toxicity legislation, staff was and continues to be instrumental in insuring that the focus is on broad fire safety considerations.

The New York State process of formulating a combustion toxicity testing regulation has been considerably slowed through the efforts of a coalition formed and staffed by the state affairs department. New York administration and legislators have been bombarded with letters and testimony attacking the proposal on the grounds of faulty science, conflict of interest, inherent liability concerns, and more. The group responsible for promulgation, the Uniform Fire Prevention and Building Code Council, as a result of the constant pressure, has more or less admitted the need to take a closer look at the possible ramifications of such a regulation.

Many states have indicated their intent to wait for the outcome in New York. Action there is expected to be a contagion in other states. The State Government Affairs Committee is urging SPI to endorse the National Bureau of Standard's four-point program as an alternative to bolster our ability to refute toxicity date collection schemes in the future.

Solid Waste

The latter part of 1985 and 1986, so far, has proven to be the "year of recycling/resource recovery." Numerous pieces of legislation have been aimed at the plastics industry in an effort to punish plastics and reward and encourage more recyclable packaging. In efforts to deal with solid waste crises in several states, restrictive legislation is being formed to tax, restrict or ban the placement of plastics in the solid waste stream and, in some cases, the marketplace.

The state government affairs department has submitted written comments, presented testimony, and worked directly with legislators and their staff to focus legislative attention on resource recovery alternatives in 1986.

The New Jersey legislature has bills under consideration which set deposit ultimatums on plastics containers, and threaten bans as the penalty for not attaining required recycling goals. A task force of those with a vested interest in protecting plastics, including grocers, food, and ingredients industries, was formed and staffed by the state government affairs department. The group has met several times to coordinate information and lobbying strategy.

Staff was successful in thwarting attempts in Pennsylvania to pick up language for consideration identical to that in New Jersey. Direct lobbying coalition involvement by staff also resulted in anti-plastics language being reconsidered or entirely dropped in Vermont, Minnesota, Wisconsin, California and Oregon.

The department has worked with a variety of groups to recommend methods of dealing with solid waste crises. Staff represents SPI on the Recycling Forums of New Jersey and New York State. Staff has represented SPI at a number of solid waste conferences, including the Association of New Jersey Recyclers, Eastern Regional Conference of State Governments, Oregon Association of Recyclers, and New York State Legislative Commission on Solid Waste Management, among others.

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Other Activities

In efforts to continue to build a political network, staff has developed working relationships with groups of elected officials, including the National Governors' Association, Council of State Government, National Conference of State Legislators, Conference of Insurance Legislators, etc.

SPI has also joined and leveraged business and industry associations in Vermont, Wisconsin, Maryland, New York and Ohio.

In response to the product liability issue and its primary importance to SPI members, staff is joining all coalitions that have formed to monitor and develop policy on tort reform. Staff will regularly report to readers of *State Reporter* on those state tort efforts which appear to be significant as well as the appropriate state contacts. We will urge members to get more involved by joining local coalitions.

The Department has recently become involved in direct lobbying on mold lien/retention legislation. Although efforts to pass a mold retention bill failed this year in Wisconsin, staff will seek to have mold retention language reintroduced early next session. Staff has lobbied extensively on mold lien legislation in Michigan. The bill has since passed both the House and the Senate.

To hone our ability to call on appropriate affected members to help in dealing with the torrent of state legislation affecting plastics, we are currently creating a computer database of plastics plant locations, operation profiles, and other politically pertinent information.

Mr. Robert Mulligan, Vice President of Industry Relations for Owens-Corning Fiberglas, assumed the position of Chairman of SPI's State Government Affairs Committee, effective June 1, 1985. He replaced Mr. Robert Belliveau, Associate Manager, Technical Government Relations for Proctor & Gamble, who served as Chairman since 1983.

The State Government Affairs Department expanded with the creation of the position of assistant director, and subsequent appointment of Kenneth Lane to that position, in October 1985.

The fine-tuning of Commerce Clearing House use has resulted in an efficient and cost-effective state legislation tracking tool. This, along with the numerous relationships developed with member companies and the staff of other associations, has resulted in the timely notification of legislation affecting the industry.

The *State Reporter*, now in publication for a year and a half, and with a recent "facelift," has grown in popularity. Many in the state affairs arena depend on the *State Reporter* for its timely news on issues not only in the plastics industry, but also the overall atmosphere in the states.

Plans for 1986-87

The State Government Affairs Department will work with the newly-formed solid waste coalition and help identify information needs from a state affairs perspective.

Staff will work to better coordinate the Department with SPI regions on legislative receptions. The Department will continue expansion of allies and contacts in key issues.

The Department will continue to expand issue responsibility to meet needs of operating divisions and membership such as product liability and hazardous materials laws and regulations.

Staff will continue expansion of allies and contacts on key issues and increase involvement with state public policy organizations which seed bills across the country such as Council of State Governments, National Conference of State Legislators, etc.

State Government Affairs Committee meetings will be structured to deal with issue debates and strategy more than information exchange which takes place through other channels like *State Reporter*.

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Technical and Regulatory Affairs Department Report

1985-86

The SPI Technical Department was reorganized, renamed, and relocated from New York to Washington last Fall. Its size was reduced from three professionals and two support staff to two professionals and one support staff, and its responsibilities broadened to encompass some of the regulatory liaison work for the association federal agencies. Pat Toner assumed the position of Director of Technical and Regulatory Affairs in September, and Dennis Burgess joined the staff in March as Project Coordinator of Technical and Regulatory Affairs.

Combustibility

Fiscal 1985/86 was an active year for the Technical Department in combustibility. The operative SPI Committee in this area is the Coordinating Committee on Fire Safety. Much of the attention has been focused on the proposed regulation in New York State to require materials to be tested for combustion toxicity by the University of Pittsburgh (Alarie) method. A cornerstone of much of our testimony in New York rested on our contention that the state of the art of combustion toxicity testing is not sufficiently advanced to be useful for regulatory purposes and that the Pittsburgh method is flawed. Two research projects, one at Southwest Research Institute and one at the Fire Research Station at Boreham Wood England, which support our position were completed in time for use in New York. In addition, at the direction of the IMC Steering Committee, the CCFS developed a technical alternative and presented it to New York State. Lastly regarding New York State, F. McGarry, New York State Fire Administrator and chief architect of the New York proposal was a guest speaker at the CCFS Summer meeting. As a result of this contact, continuing informal dialogue has been established.

The study of the role of carbon monoxide in fire deaths was completed this year. The data will now be examined using biostatistical techniques to determine all the influencing factors. A paper on the literature search portion of the study was presented by the principle investigator at the International Fire and Flammability Conference.

A slide/tape presentation on "Plastics in Today's Fire Environment", developed by the CCFS and the International Society of Fire Service Instructors (ISFSI) was completed and is now being promoted by ISFSI to the fire service community.

We joined with the Man-Made Fiber Producers Association, the American Textile Manufacturers Association, the Carpet and Rug Institute and the National Association of Bedding Manufacturers in supporting Operation Life Safety, an arm of the International Association of Fire Chiefs, which advocates the use of smoke detectors and sprinklers. We also joined with these Associations in financially supporting the continuing research being conducted by the NBS Center for Fire Research on the effect different fire conditions have on smoke generation and toxicity.

Comments were submitted on a proposed revision to the U.S. Navy Foam Mattress Specification which, among other items, proposed a smoke toxicity limitation using the Pittsburgh procedure.

Lastly, in the communications area we responded to a press conference held by the International Association of Fire Fighters criticizing our opposition to combustion toxicity testing. The culmination of this spurt of press interest was an appearance on the Today Show with a representative of the IAFF.

The 14th Annual Combustibility Symposium was held in March. This year it was cosponsored by the Fire Retardant Chemicals Association and the CCFS.

Occupational Health, Safety and Environment

As in combustibility, fiscal 1985/86 was an active year. In this area the operative SPI committee is the Occupational Health and Environmental Issues Committee (OHEIC). The changes in the Hazardous Waste regulations which effect small quantity generators (less than 1000 kg/mo) and the OSHA Hazard Communication Standard provided the impetus to the Occupational Health and Environmental Issues Committee to offer seminars in five cities to explain the new requirements to plastics processors. The manual

developed for the OSHA Hazard Communication Standard Seminars is now a "hot selling" SPI publication as the May 25, 1986 deadline for all manufacturing employers approaches. Advisory bulletins were issued on the new Hazardous Waste Regulations and on the "article exemption" for fabricated plastic products from the Hazard Communication Standard.

OHEIC submitted comments to OSHA on its proposed extension of access to trade secret information to employees or their representatives under the Hazard Communication Standard. We advocated institution of sufficient safeguards to protect trade secret information.

OHEIC also submitted comments to EPA on its proposed regulations to control stormwater.

An ad hoc Formaldehyde Resins Task Group filed comments with OSHA on its proposed occupational exposure standard for formaldehyde. The Task Group requested an exemption from the standard of acetal resins because of minimal (less than 0.5 ppm TWA g) worker exposure during processing and suggested that certain thermosetting resins and/or processing operations could be exempted for the same reason. We also requested exemption from the labeling requirements for finished plastic products.

A petition has been filed with EPA to exempt from the export notification requirements the export of hydroquinone when it is used as an inhibitor or stabilizer in polyester resins or vinyl monomers. Hydroquinone is the subject of a TSCA section 4 test rule.

Special Programs

A petition was filed with FDA to permit up to 100 ppm of tertiary butyl alcohol (TBA) in polypropylene used for food contact applications. TBA is an inadvertant contaminant in polypropylene resulting from thermal decomposition of a melt flow improvement agent.

Comments were filed on a proposed TSCA section 8 reporting rule for vinyl acetate. It was noted the exemption of studies of vinyl acetate as a "food additive" from the requirement for submission of health and safety studies.

The 2 year vinyl acetate toxicity studies being sponsored by the Vinyl Acetate Task Force continue at Hazleton Laboratories. The animals in the inhalation studies have been sacrificed, the drinking water study has about 3 months remaining in the in-life phase.

OHEIC and the Epoxy Resin Formulators Division initiated participation in and financial support for the CMA project panel on methylene dianiline (MDA). MDA is used as a feedstock for MDI, a polyurethane precursor, and as a curing agent for certain specialty epoxy resins, filament wound epoxy/fiberglass pipe, and advanced composites. OSHA is proposing to establish an occupational exposure standard for MDA through a negotiated rulemaking process.

The Epichlorohydrin Task Group filed comments with EPA on its proposed recommended maximum contaminant level of zero epichlorohydrin (ECH) in drinking water. The Task Group recommended ECH not be listed because there is no evidence of its presence in drinking water and the probability of inadvertant contamination is nil due to the limited distribution of ECH.

The bisphenol A Task Group completed a 2 week dust inhalation toxicity study and a freshwater and saltwater aquatic toxicity study. The results were presented to EPA. EPA is reportedly satisfied that no further aquatic studies need be conducted but is likely to require a 90 day BPA dust inhalation study.

The diglycidyl ether of bisphenol A (DGEBA, the basic epoxy resin) Task Group has initiated a dermal teratology study. The probe portion of the study has been completed. The protocol for the full study has been submitted to EPA for review.

Certification

SPI approved a certification program for vinyl windows last Spring. After start up, administration of the program was transferred to the staff of the Vinyl Window and Door Division. Exploratory discussions have taken place with the Medical Products and Expanded Polystyrene Divisions regarding their developing interest on certification program.

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Solid Waste

Technical staff continued to provide staff support for the activities of the Plastics Recycling Foundation until the Foundation hired an Executive Director. Technical staff also participated in a Foundation project review and approval meeting at the Recycling Institute. Staff is part of an Engineering Advisory Committee to oversee and provide technical resources to the Recycling Institute Pilot Plant Management.

Plans for 1986-87

Increase the coordination of SPI's activities in building codes and standards making bodies.

Focus more of the SPI's occupational health safety and environment activities on the problems of processors.

Build the data base on plastics recycling and resource recovery available to SPI, the Plastics Recycling Foundation/Institute and the National Solid Waste Coalition.

Develop internal guidelines to help operating unit staff establish certification programs.

April 25, 1986

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