



A Division of The Society of The Plastics Industry, Inc.

February 28, 1992

TO: All Vinyl Institute Members

RE: Tellus Study

As you may be aware, on January 31, the Tellus environmental firm issued a study entitled "Assessing the Impacts of Production and Disposal of Packaging and Public Policy Measures to Alter Its Mix". Many portions of the study make very damaging (and inaccurate) conclusions about the environmental impact of vinyl packaging.

Although the VI objected strongly to the draft report during the peer review process and submitted specific data challenging the study's conclusions, our input was not reflected in the version issued January 31. Accordingly, on that date, we began a campaign to publicly discredit the study and press for its recall and revision.

Given the roundly negative reception the study has received from our colleagues in the packaging/plastics industry, it is unclear whether Tellus will stand by this version or take corrective action. In the interim, however, we can expect to see media coverage on it and you may begin to get questions from customers and others. To help you field those questions, we have prepared the attached position paper for your use. If you would like additional copies, or wish to discuss the study further, please call me or Meredith.

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Attachment

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**The Tellus Study on Packaging:
The Vinyl Institute Response
2/26/92**

On January 31, 1992, the Tellus consulting firm issued a study titled "Assessing the Impacts of Production and Disposal of Packaging and Public Policy Measures to Alter Its Mix." The report was issued over the objections of The Vinyl Institute, which had submitted extensive comments concerning the accuracy of the study prior to its publication. The inaccuracies in the study that the Institute cited include:

- Energy required to produce vinyl is overestimated by 17 percent, at 79.67 BTUs per ton rather than 68.00 BTUs per ton as estimated by Franklin Associates in a March 1991 study.
- Production of particulates is listed in the report as 39 pounds per ton. Recent studies instead put that number at between 0.99 and 1.07 pounds per ton.
- Emission data for sulfur dioxide and volatile organic compounds are estimated at 63.7 pounds per ton and 51 pounds per ton, respectively, while other technical studies put those totals between 21.2 and 23.67 pounds per ton for sulfur dioxide and between 2.63 and 2.67 pounds per ton for volatile organic compounds.
- The number of PVC producers (11 today vs. 27 in 1989) and the percent of PVC production that goes into packaging applications (6.6 percent vs. 9 percent) are in error.

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- The section describing the current FDA (Food & Drug Administration) status for vinyl is inaccurate. The study states that "PVC can no longer be used to make bottles, blister packs, boxes and other rigid and semi-rigid containers for food." To the contrary, there is no FDA restriction on the use of PVC for food-contact applications, as long as the vinyl compound used meets the established residual vinyl chloride monomer (RCVM) level of no more than 5 parts per billion.
- The discussion of waste disposal options for vinyl also ignores recent developments in automated separation, improvements in incinerator operating conditions and related research and advancements.

The Vinyl Institute has urged, and continues to urge, that Tellus recall this study and revise it to address these issues. In its current format, the study paints a picture of vinyl products that is inaccurate and outdated.

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