

Agenda

PVC SAFETY GROUP MEETING

September 25, 1980
Washington, D.C.

EPA Revision of Vinyl Chloride Standard

I. Background

- A. Original EPA Position
- B. EDF Position
- C. Carcinogen Policy Hearings
 - 1. Data
 - 2. Witnesses
- D. EPA Estimated Costs for Compliance
- E. TRW Contract
 - 1. Reasons for contract
 - 2. Goal of contract
 - 3. EPA authority to use private contractor
 - a. No delegation of authority to enter premise for data gathering purposes
 - 4. EPA prohibited from delegating rulemaking
 - 5. Question on sharing confidential information with contractor
- F. EPA Decision Date

II. Possible Strategies

- A. Seek to rescind existing proposed '77 amendment and existing Vinyl Chloride Standard
- B. Strategy A plus oppose totally the proposed data gathering effort and subsequent amendments by TRW and EPA

Important

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II. Possible Strategies (continued)

- C. Oppose the proposed amendments because there is no health basis, but accept amendments favorable to the PVC Safety Group
- D. Work with EPA on revising standard to alleviate the PVC Group's complaints
- E. Do not oppose any EPA effort
- F. Work with Congress to amend § 112

CMA Utilities are getting into this in a big way. Next year.

III. Tactics

- A. Economic analysis
- B. Health data summary
- C. Legal summary
- D. Development of P.R. summary
 - 1. Use with media
 - 2. Use with Congressional and EPA staff

IV. Future Action

- A. TRW plant visit problem
- B. Law suits filed by Department of Justice
 - 1. Options
 - a. Press release
 - B. Contact with EPA and Justice lawyers
- C. Preparation to implement strategy

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October 9, 1980

Possible Strategies:

1. Rescind existing proposed '77 amendment.
2. Rescind existing vinyl chloride standard.
3. Rescind existing '77 amendment and oppose totally the proposed data gathering effort and subsequent amendments by TRW and EPA.
4. Oppose the proposed amendments because there is no health basis, but accept amendments favorable to the PVC Safety Group.
5. Work with EPA on revising standard to alleviate the PVC Group's complaints.
6. Do not oppose any EPA effort.
7. Work with Congress to amend § 112.

October 9, 1980

FOR CONSIDERATION BY THE SPI PVC SAFETY GROUP
ALTERNATIVES COMMITTEE

OUTLINE--CONTINGENCY PLANNING

Purpose: To identify some responses to potential
[name of agency] regulatory activity.

Situation: 1. [name of agency] promulgates and enforces
regulations addressing chemical substances
pursuant to [number] acts:
a. [Name of Act]
b. [Etc.]

2-4. [Continue with general discussion of the
regulatory posture taken by [name of agency]
toward PVC/VCM and toward the potential
hazards presented by PVC/VCM, paying careful
attention to the approach [name of agency]
has taken toward other substances associated
with the same potential hazards.]

5. [Name of Act]
[Provide basic discussion of situation as it
relates to referenced act and repeat this
treatment for each act referenced in paragraph 1
above.]

SPI-09016

What If:

1. [Cite relevant act or statutory provision]:
[Insert description of regulatory action of concern. The concern is usually with the less favorable course of action. Using this format, list all potential activities of concern.]
 - a. Impact: [Low, Medium or High]
 - b. Our influence: .[Low, Medium or High]

Tracking: Information and Sources:

1. [Cite relevant act or statutory provision] :
 - a. [name of source]
 - b. [Etc.; List all sources.]

[Possible sources include: direct agency contacts, other trade associations, Keller & Heckman, trade press, other industry sources, agency announcements, the Federal Register, public news media, member information, etc.]

Triggers: 1. _____ :

 [Cite relevant act or statutory provision]

 [Insert description of event which would

 trigger activation of contingency plans.]

 2. [Etc.]

Contingency Plans: [Describe the plans to be implemented if any of these trends develop into an active threat.]

Trigger 1: [Contingency Actions
a.
b.
c.]

Trigger 2: [Etc.]

Anticipatory Action Underway: [Describe any actions being
taken by the PVC Safety Group.]