

To: John Lawrence From: Paula Dunnigan

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B. F. GOODRICH

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SPI/PVC SAFETY GROUP
ALTERNATIVES COMMITTEE
CONTINGENCY PLAN FOR EPA (CLEAN AIR ACT)

PURPOSE: To identify some responses to potential EPA regulatory activity on vinyl chloride.

SITUATION: (1) EPA promulgates and enforces regulations addressing chemical substances pursuant to four acts:

- (a) Clean Air Act (CAA)
- (b) Clean Water Act (CWA)
- (c) The Toxic Substances Control Act (TSCA)
- (d) The Resource Conservation and Recovery Act (RCRA)

CLEAN AIR ACT

- (2) The agency has regulated VCM as a hazardous pollutant pursuant to CAA, Section 112 (NESHAPS) since October 21, 1976. The standard is designed to restrict VCM emissions to the level attainable through the use of the best control technology available at that time.
- (3) As one of the settlement provisions of a lawsuit brought by the Environmental Defense Fund (EDF), the agency agreed to propose more stringent vinyl chloride regulations. These amendments were proposed in 1977 (Vinyl II) but never got beyond public comment. Because of the length of time which has elapsed, these amendments are regarded as out-of-date, and further agency action to finalize these particular amendments is deemed unlikely.
- (4) The agency has contracted with TRW to study the current VCM standard and the status of industry compliance and to recommend whether the standard needs revision.

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- (5) Congress will address the task of reauthorizing appropriations for the CAA for FY 1982. Substantive amendments to the act are neither mandated nor precluded by the act. CMA will be putting forth a major effort to gain support for its proposed statutory amendments.

WHAT IF?

- (1) The agency proposes amending the present VCM standard.
- (a) Impact - Potentially high
 - (b) Our influence - Medium
- (2) Congress signals its intent to amend the CAA.
- (a) Impact - Medium
 - (b) Our influence - Medium

(3)

TRACKING:Sources

- Direct agency contacts
- Contacts with TRW
- Contacts with Congress
- CMA
- Keller & Heckman
- *Business Roundtable ; AIHC*

TRIGGERS:

- (1) TRW report to EPA contains recommendation to revise standard.
- (2) Congress announces committee hearings on CAA.

CONTINGENCYPLANS:

- Trigger (1) A. Alert the PVC Safety Group.
- B. Evaluate the TRW recommendations.
- C. Present data on health and safety and on the status of technology to the agency.
- D. Present modifications to the standard which are advocated by the industry.

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- Trigger (2) A. Alert the PVC Safety Group.
 - B. Obtain CMA position papers on CAA revisions.
 - C. Actively support CMA efforts and articulate unique aspects of PVC Safety Group's position.

ANTICIPATORY ACTION
UNDERWAY:

- (1) Assessment of health data - Health Committee.
- (2) Assessment of manufacturing technology - Manufacturing Technology.
- (3) Develop PVC industry position on desirable NESHAPS modifications.
- (4) Develop PVC industry recommendations for revisions in the CAA.

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