

CARB



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

November 27, 1990

Mr. Ladd Smith
Occidental Chemical Co.
360 Rainbow Boulevard South
Niagara Falls, NY 14302

Dear Ladd:

As follow up to our conversation this morning on the upcoming hearings of the California Air Resources Board on the listing of vinyl chloride as an air contaminant, enclosed is the material forwarded on November 5 to members of the VI Health, Safety & Environment Committee. If you would also like the background documents, let me know.

If after reviewing this information you believe that the Vinyl Institute should plan on submitting comments, let me know. The time is growing short for preparing comments and I would need some assistance in their preparation. Since I spoke with you earlier, Frank Borrelli (Chairman of the VI Health, Safety & Environment Committee) and I have spoken and are in the process of making additional follow up calls on my November 5 memo.

It was nice talking with you again.

Sincerely,

Meredith N. Scheck
Assistant Director

CC: J. Coburn
F. Borrelli, Georgia Gulf

SPI-05562



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

September 8, 1989

Mr. Robert Barham, Chief
Toxic Air Contaminant Identification Branch
Air Resources Board
Attn: Vinyl Chloride
1102 Q Street
Sacramento, California 95812

Re: Draft Report on Vinyl Chloride

Dear Mr. Barham

On August 29th, the Vinyl Institute* received the preliminary draft report on vinyl chloride dated July 1989 being prepared by the California Air Resources Board (CARB). There has been, therefore, a limited amount of time for our membership to thoroughly review the documents prior to the comment deadline.

Nevertheless, after reviewing the document, there are at least two areas of discussion that are inadequately treated in the California Air Resources Board (CARB) document. Therefore, most of the comments will be spent on those two areas. They are the pharmacokinetic knowledge of vinyl chloride in the risk assessment approach and a total inadequate treatment of the large number of epidemiology studies in the published literature. These are very concisely dismissed by the Department of Health Services (DHS) as being unacceptable to be used in the risk assessment process for regulatory purposes.

- * The Vinyl Institute is an operating division of the Society of the Plastics Industry, Inc. Its members include Air Products and Chemicals, Borden Chemicals & Plastics, Certain-Teed Corporation, Dow Chemical USA, BFGoodrich Company, Georgia Gulf Corporation, Occidental Chemical Corporation, PPG Industries, Shintech Inc., and Vista Chemical Company. Together, these companies account for more than 80% of the domestic production of both vinyl chloride and polyvinyl chloride.

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