



OxyChemical Corporation

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JUL 27 1988

MEMO

PVC Resins/PVC Fabricated Products

W. F. CARROLL

To W. F. CARROLL, JR. Date JULY 27, 1988
From D. GOODMAN
Subject VCM DISCREPANCY IN REGS

Yesterday I handled a telephone inquiry about Proposition 65 from Mr. Mike Cohen of Crestline. As a result of our conversation, Mike was comfortable that there were no problems in satisfying CA's Prop 65 when using OxyChem products. After thinking about our discussion; however, he called me back to ask how the EPA RVCM specification of 2 ppb in drinking water through PVC pipe reconciles with the CA significant risk level of 0.3 micrograms per day ingestion of RVCM over 70 years.

The point is that it doesn't reconcile, and I had to tell him that. In the prescribed case, ingestion of two liters of water containing 2 ppb VCM per day contributes about 2 micrograms per day or about 7 times the CA significant risk level.

My reason for this note is to remind all that this discrepancy exists and to suggest an OxyChem explanation. The most obvious explanation is that 2 ppb is recommended by EPA as the lowest reliable analytical concentration for measuring VCM content. This would still make PVC pipe acceptable for California, since it conforms to existing U. S. regulations. Parenthetically, I need to add that potable water passing through PVC pipe made from OxyChem resin and compound contributes less than 2 ppb as new pipe and much less as aged pipe, so that the CA number might be achieved with our actual RVCM values.

The end result is that we don't believe there is a problem, but I thought you should know that this request came in.

Don

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