

PVC SAFETY GROUP

Keller & Heckman Offices
WASHINGTON, D.C.

Wednesday, September 12, 1979
10:00 A.M.

S U M M A R Y

- 1 - The Lawyers subcommittee is to request SPI to intervene in any cases involving interpretation of EPA's enforcement practices (i.e. the present Hooker/Tenneco petition or any other petitions in other regions) during the next 12 months.
- 2 - The Lawyers subcommittee was directed to determine the best way to challenge EPA's right to issue letters of interpretation of emission rules and to take appropriate legal action.
- 3 - A meeting is to be set up by the Manufacturing Technology subcommittee with the Environmental Defence Fund (EDF) to discuss EDF's ideas to lowering VCM emissions.
- 4 - All companies are requested to copy the Keller and Heckman office on all EPA filing relating to relief valve discharges. The material sent to Keller & Heckman should also include any information on fence-line levels of VCM at the time of emergency discharges. (EPA does not require this information).
- 5 - Data on present levels of residual VCM in polymers has been tabulated and is to be supplied to the South Coast Air Quality Management District (SCAQMD) as requested.
- 6 - The Health subcommittee was authorized to conduct a literature search on fire related respiratory disorders.
- 7 - The five position papers on VCM/PVC are ready for distribution to member companies.
- 8 - The PVC Safety Group's funds available as of August 31, 1979 stand at \$107,253.

* * * *

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

355 Lexington Avenue • New York, N.Y. 10017

(212) 573-9400

SPI-08835

ATTENDEES:

Steven W. Schaefer - CHAIRMAN - Diamond Shamrock Corporation, 1100 Superior Avenue
Cleveland, OH 44114
A. Ross Adams - Air Products & Chemicals, P. O. Box 538, Allentown, Pa 18105
Gary H. Baise - Beveridge, Fairbanks & Diamond, 1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036
Scott W. Bowen - Beveridge, Fairbanks & Diamond, 1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036
Bart A. DiLiddo - B. F. Goodrich Chemical Division, 1600 Oak Tree Blvd. Independence,
Ohio 44131
R. B. Downey - B. F. Goodrich Chemical Division, 1600 Oak Tree Blvd. Independence,
Ohio 44131
J. E. Hadley - Keller & Heckman, 1150 17th Street, NW. Washington, D.C. 20036
Lawrence P. Halprin - Keller & Heckman, 1150 17th Street, N.W. Washington, D.C. 20036
James B. Hardwick (for John Ertel), Pantasote Inc. 26 Jefferson St. Passaic, NJ 07055
Robert W. Hill - Diamond Shamrock Corporation, 1100 Superior Avenue, Cleveland,
Ohio 44114
Joseph A. King (for T. C. Walker) Firestone Plastics Company, P. O. Box 699,
Pottstown, PA 19464
David A. Kuhn - Conoco Chemicals, P. O. Box 2197, Houston, TX 77001
Robert W. Laundrie - General Tire & Rubber Company, One General Street, Akron, OH 44329
John R. Lawrence - SPI, 355 Lexington Avenue, New York, NY 10017
D. C. Nuechterlein - Dow Chemical Company, 2020 Dow Center, Midland, MI 48640
Robert C. Sander - Air Products & Chemicals, Inc, P. O. Box 538, Allentown, PA 18105
D. K. Spencer - Shell Chemical Company, P. O. Box 2463, Houston, TX 77001
Matthew M. Swetonic - Hill & Knowlton, Inc. 633 Third Avenue, New York, NY 10017
T. R. Torkelson - Dow Chemical U.S.A. 1603 Bldg. Midland, MI 48640
Robert M. Walter, Esq. Firestone Tire & Rubber Company, 1200 Firestone Parkway,
Akron, OH 44313

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1 - The minutes of the March 30, 1979 meeting were approved as written.

REDACTED

SPI-08836

- 6 - Referring to the EDF compromise proposal defining proposal concepts (June 26, 1979 letter attached), Mr. Baise reported that Mr. Rauch (EDF) continues to be anxious to discuss the possibility of lowering VCM emissions by better control fugitive emissions or by other means. After some discussion, it was agreed that a meeting should be held with EDF and representatives from the PVC Manufacturing Technology subcommittee. It was also agreed that an F.O.I. request would be filed to determine what information on VCM emergency discharges has been supplied to EDF.
- 7 - Mr. Hadley referred to his letter of September 7 containing the summary of information on relief valve discharges. It was indicated that not all companies have been supplying this information on a regular basis and it was requested that copies of all information sent to EPA be copied to the Keller & Heckman office.

It was further noted that any information on "fence line" levels of VCM at the time of emergency discharges would be useful to send to Keller & Heckman. All information sent to SPI's counsel will be handled in a confidential manner.

- 8 - Mr. Hadley reported with respect to the pending case with the California South Coast Air Quality Management District (SCAQMD), that the SPI amicus curiae brief is ready for filing when the case proceeds. In the meantime, the B. F. Goodrich case has been dropped pending the Stauffer case.

It was also reported that the survey of present levels of residual VCM in polymers requested by SCAQMD has been tabulated. It was noted that it would be better to report the standard deviation rather than the range of reported values. This data will be passed along to SCAQMD.

9 - Health Subcommittee

- (a) Dr. Torkelson reported on the proposal from Dr. Crosbie to conduct a literature search on fire related respiratory disorders. This study, to be conducted at a cost not to exceed 2,000 pounds, was approved by vote of the Steering Committee.
- (b) It was further reported that the investigation of the Ohio Holiday Inn fire showed that although there was a PVC wall covering reported, the material was not cited as causing any problems. A review of the procedures for assuring that such wall covering are installed with the proper adhesive is to be made.
- (c) With respect to the CPSC animal study involving vinyl chloride, there is no information available on when and where it may be published.
- (d) The original Tabershaw/Cooper study on vinyl chloride workers is being reviewed to determine whether it contains any information relative to PVC dust exposures.

LAW OFFICES
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June 26, 1979

RECEIVED DEC 10 1979

Re: EDF Compromise Proposal

REDACTED

SPI-08840

BEVERIDGE, FAIRBANKS & DIAMOND

REDACTED

SPI-08841

SURVEY RESULTS

Average Residual Monomer Levels
For Suspension Resins After Stripping

Homopolymer

High Molecular Weight

<u>Current</u>	Range	550-100 ppm
	Average	237 ppm
<u>Future</u>	Range	550-50 ppm
	Average	241 ppm

Low Molecular Weight

<u>Current</u>	Range	382-1 ppm
	Average	167 ppm
<u>Future</u>	Range	382- < 1 ppm
	Average	135 ppm

Copolymer

More than 10% Comonomer

<u>Current</u>	Range	350-300 ppm
	Average	333 ppm
<u>Future</u>	Range	350-200 ppm
	Average	300 ppm

Less than 10% Comonomer

<u>Current</u>	Range	400-213 ppm
	Average	320 ppm
<u>Future</u>	Range	346-213 ppm
	Average	286 ppm

September 7, 1979

Mr. J.R. Lawrence, Technical Director
The Society of the Plastics Industry, Inc.
355 Lexington Avenue
New York, New York 10017

Dear Mr. Lawrence:

We have analyzed the General Ledger computer printouts for the months of June and July, 1979 covering the separate operations of the SPI-PVC Safety Group and of the EDC Committee of the Safety Group, plus the legal and public relations billings included in the ledger charges. We have also "estimated" the August expenses that would complete the first quarter activity, however, we made no attempt to forecast Assessment Receipts for the month of August. Summary Source and Disposition of Funds for the Safety Group and for the EDC Committee, covering the first quarter of 1979-80, have been prepared on the above basis and are attached.

Safety Group Expenditures for the quarter are estimated at \$31,314.94, of which Legal Expense and Public Relations Expense account for 79% and 20% respectively. The May invoice from Hill & Knowlton (\$5,203.74) was deducted from the 1978/79 Carry-over and is not reflected in these first quarter expenses.

The 1978/79 Safety Group Assessment of \$100,000 was completely paid-up as of June 30, 1979. The 1979/80 Assessment of \$100,000 was 7.5% paid as of July 31, 1979.

EDC Committee expenditures for the quarter are estimated at \$5,304.15 and is almost entirely Legal Expense. The 1978/79 Assessment for this committee, of \$12,000, was still only 83% paid-up as of July 31, 1979. Conoco Chemicals and Vulcan Materials Co. were the two delinquent members as of 7/31/79. This committee, supposedly self-sustaining, was in a deficit position as of 5/31/79 and is still in a deficit position as of 8/31/79 of practically the same amount (\$8,122.15). Obviously, an additional assessment against the twelve member companies is required as well as the prompt collection of same.

SPI-08843

Please continue to send me copies of all minutes of meetings, as well as, copies of all legal and public relations billings included in each general ledger printout. It would be appreciated if this information is sent monthly as soon as it is available.

Very truly yours,

J.J. McCoskey
Controller

JJM:MEB:dr

Attachments (3)

cc: Messrs: T.C. Walker, President, Firestone Plastics Company
R.L. Harding, Jr., President, SPI
S.W. Schaefer, Chairman, Steering Committee, SPI

SPI-FVC SAFETY GROUP
SOURCE AND DISPOSITION OF FUNDS
AS OF 8-31-79

(JUNE & JULY ACTUAL, AUGUST ESTIMATED)

AMOUNT

SOURCE:

1. <u>Carryover from 1978/79 Operations-Per Ledger Printout</u>				\$ 24,931.53	
Less: Hill & Knowlton Billing for May Services Not Included in Public Relations Expense as of 5/31/79.				<u>(5,203.74)</u>	
<u>Net Carryover From 1978-1979</u>					\$ 19,727.79
2. <u>Assessments:</u>	<u>Total</u>	<u>Assmts.</u>	<u>Assmts.</u>	<u>Net Assmts.</u>	
	<u>Assmts.</u>	<u>Paid thru</u>	<u>Due at</u>	<u>7/31/79</u>	
1978/79 Assessment Unpaid at 5/31/79	\$ 18,840.00	\$ 18,840.00	\$ -		
1979/80 Assessment	100,000.00	7,610.00	92,390.00		
Total Assessment Income		\$ 26,450.00			26,450.00
Net Assessments Receivable (See Attached Detail)			\$ 92,390.00		92,390.00
3. <u>Meeting Income:</u>					-
4. <u>Sales of Literature:</u>					-
<u>Total Funds Available - 8/31/79</u>					<u>\$138,567.79</u>

DISPOSITION:

1. <u>Current Year Expenses:</u>					
Legal Expense (June & July Billings Only)			\$ 24,595.98		
Public Relations Expense (June Billing Only)			6,268.96		
Meeting & Travel Expense (Estimated)			200.00		
Research & Development Expense			-		
Office Supplies & Expense (Estimated)			200.00		
Telephone Expense (Estimated)			50.00		
Miscellaneous Expense			-		
<u>Total Expenses</u>					\$ 31,314.94

<u>NET FUNDS AVAILABLE AT 8/31/79</u>	<u>\$107,252.85</u>
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NOTE: August billings would normally be included in September Ledger figures.

SPI-08845

EDC COMMITTEE
SOURCE AND ALLOCATION OF FUNDS
AS OF 8-31-79

(JUNE & JULY ACTUAL, AUGUST ESTIMATED)

				<u>AMOUNT</u>
<u>SOURCE:</u>				
1. Carryover from 1978/79 Operations-Per Ledger Printout				\$ (8,818.02)
2. <u>Assessments:</u>	<u>Total</u>	<u>Assmts.</u>	<u>Net Assmts.</u>	
	<u>Assessments</u>	<u>Paid thru</u>	<u>Due at</u>	
		<u>7/31/79</u>	<u>7/31/79</u>	
1978/79 Assessment Unpaid				
at 5/31/79	\$ 6,000.00	\$ 4,000.00	\$ 2,000.00	
Total Assessment Income		\$ 4,000.00		4,000.00
Net Assessments Receivable			\$ 2,000.00	2,000.00
(See Attached Detail)				
Total Funds Available -				\$ (2,818.02)
<u>DISPOSITION:</u>				
1. <u>Current Year Expenses:</u>				
Legal Expense (June & July Billings Only)			\$ 5,204.13	
Meeting Expense (Estimated)			100.00	
Total Expense				5,304.13
Net Funds Available at 8/31/79				\$ (8,122.15)

SPI-PVC SAFETY GROUP
EDC COMMITTEE
ASSESSMENT INCOME ANALYSIS

<u>Company</u>	<u>Total</u>	<u>Payments</u>	<u>Total</u>	<u>Payments</u>	<u>Net Assmts.</u>
	<u>1978-79</u>	<u>Rec. thru</u>	<u>1979-80</u>	<u>Rec. thru</u>	<u>Receivable</u>
	<u>Assmts.</u>	<u>7-31-79</u>	<u>Assmts.</u>	<u>7/31/79</u>	<u>at 7/31/79</u>
orden Chemical Corp.	\$ 1,000	\$ 1,000	\$ -	\$ -	\$ -
onoco Chemicals	1,000	-	-	-	1,000
iamond-Shanrock Corp.	1,000	1,000	-	-	-
ow Chemical U.S.A.	1,000	1,000	-	-	-
hyl Corporation	1,000	1,000	-	-	-
.F. Goodrich Chem., Co.	1,000	1,000	-	-	-
DI Americas, Inc.	1,000	1,000	-	-	-
PG Industries, Inc.	1,000	1,000	-	-	-
hell Chemical Co.	1,000	1,000	-	-	-
cauffer Chemical Co.	1,000	1,000	-	-	-
ion Carbide Corp.	1,000	1,000	-	-	-
ilcan Materials Co.	1,000	-	-	-	1,000
Totals	<u>\$12,000</u>	<u>\$10,000</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 2,000</u>

SPI-08846

SPI-PVC SAFE GROUP
ASSESSMENT INCOME ANALYSIS FOR
1978/79 & 1979/80 ASSESSMENTS

COMPANY	Total 1978-1979 Assessment	Payments Received thru 6-30-79	Total 1979-1980 Assessment	Payments Received thru 7-31-79	Net Asmts. Receivable at 7-31-79
Air Products & Chemicals	\$ 1,920	\$ 1,920	\$ 1,920	-	\$ 1,920
B.F. Goodrich	5,530	16,530	16,530	-	16,530
Borden Chemical	3,840	3,840	3,840	3,840	-
Conoco Chemicals	5,380	5,380	5,380	-	5,380
Diamond-Shamrock	12,300	12,300	12,300	-	12,300
Dow Chemical	15,150	15,150	15,150	-	15,150
Ethyl Corporation	3,770	3,770	3,770	-	3,770
Firestone Plastics Co.	3,080	3,080	3,080	-	3,080
General Tire & Rubber	850	850	850	-	850
Goodyear Tire & Rubber	1,880	1,880	1,880	1,880	-
Great American Chemical	540	540	540	540	-
Hooker Chemical	1,350	1,350	1,350	-	1,350
ICI Americas, Inc.	2,310	2,310	2,310	-	2,310
Pantasote Co. of N.Y.,	1,040	1,040	1,040	-	1,040
PPG Industries	3,080	3,080	3,080	-	3,080
Shell Chemical Co.	11,840	11,840	11,840	-	11,840
Shintech, Inc.	2,540	2,540	2,540	-	2,540
Stauffer Chemicals	4,420	4,420	4,420	-	4,420
Tenneco, Inc.	5,770	5,770	5,770	-	5,770
Union Carbide	1,350	1,350	1,350	1,350	-
Uniroyal Chemical	1,060	1,060	1,060	-	1,060
Totals	\$100,000	\$100,000	\$100,000	\$ 7,610	\$ 92,390