



THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

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RALPH L. HARDING, JR.
PRESIDENT

March 5, 1975

TO: VCM AND PVC PRODUCERS COMMITTEE

NEGOTIATIONS WITH EPA

This memo outlines a very tight timetable for the next three weeks, for reasons made clear below. Please mark your calendars for a meeting of the entire Committee on Friday, April 11 in Washington, with details on meeting time and place to be announced soon.

As you know, a special EPA Steering Committee met on February 25 in Durham with Mr. Goodwin and his associates. A copy of John Lawrence's report on that meeting is enclosed. In addition, a special meeting was held in Cleveland on March 3 to develop a position paper on dispersion resins, as part of the follow-up on the Durham meeting. This new report will be reviewed with the Durham EPA Group during the week of March 10.

Mr. Goodwin announced under Agenda item #1 that the draft of EPA's lengthy proposed regulation will first be available about March 10. (See page 2 of the meeting report). Between that release and March 25 detailed comments must be prepared by your committee for presentation to the NAPTAC meeting.

In order to expedite and coordinate the industry's response, Joe Hadley of Keller and Heckman and I met with Messrs. Ruckelshaus, Beveridge, and Baise on February 28. We agreed to the following plan of action:

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| <u>March 7 - 10</u> | - | <u>Issuance of EPA Draft Regulation</u>
Just as soon as copies can be obtained, duplicates will be made for distribution by Purolator Courier to each member company. |
| <u>March 19</u>
Mayflower Hotel
Potomac Room | - | <u>Meeting in Washington of "EPA Steering Committee."</u>
(The VCM-PVC Group which was at Durham). These Committee members will have studied the document as completely as time permits. They need to be as prepared as possible to recommend the key elements of the VCM-PVC response to be made at the NAPCTAC Meeting. |

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<u>March 20</u> - Mayflower Hotel Senate Room	<u>Meeting in Washington of VCM-PVC Steering Committee (Messrs. Fath, Vittone, Adams, Connors, Neuchterlein and Walker) with the EPA Steering Committee.</u> At this time the recommendations from the previous day's meeting will be reviewed and decisions will be made regarding who will present the VCM-PVC commentary to NAPCTAC.
<u>March 21</u> - Mayflower Hotel Potomac Room	Speakers for NAPCTAC, assisted by the EPA Steering Committee will begin preparation of their presentations.
<u>March 24</u> - Mayflower Hotel Senate Room	<u>Meeting in Washington for our speakers and the EPA Steering Committee - to review, coordinate and rehearse their presentations.</u>
<u>March 25 and 26</u> -	<u>NAPCTAC Meeting in Washington</u> Member company representatives are encouraged to attend.
<u>April 11</u> - No Location set yet	<u>Meeting of entire VCM-PVC Producers Committee in Washington.</u> Development of consensus on all key issues.

My decision and recommendation was that because of the short time available, your Steering Committee alone should be called to oversee these hurried preparations for the NAPCTAC meeting. Since this is only the first public airing of what EPA has in mind, your Steering Committee needs to stake out the areas of concern and keep the door open for further discussion. Mr. Ruckelshaus at first questioned my recommendation that this immediate NAPCTAC exercise be handled by the two steering committees rather than by a meeting of all 22 companies on March 20. I maintained that there was just not time for input and consensus among all 22. Further, he had earlier explained that the purpose of the "VCM-PVC" presentation to NAPCTAC is to demonstrate a "forthcoming style" - an attitude of cooperation - a desire for further meetings and discussions prior to completion and publication of the standard. This will not be anybody's last chance to comment, to call attention to problems or to propose improvements.

Subsequently, I made the same recommendation to Chairman Joe Fath, who, in agreeing, asked me to stress that everyone would receive complete copies of the EPA document as soon as humanly possible. Further, he encourages everyone to provide whatever input is deemed appropriate to any Steering Committee member, EPA Steering Committee member, or to Joe Hadley or John Lawrence.

Following the NAPCTAC we'll send you a full report promptly, together with recommendations for further review prior to the meeting on April 11.

In the interest of efficiency this course of action places a very heavy but unavoidable burden on the members of the EPA Steering Committee (March 19, 20, 21 and 24) and on the senior Steering Committee. I know that they will appreciate not only your confidence in them but also your support in making the appropriate key people

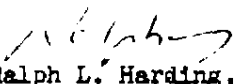
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available, as well as your help in the form of specific comments and suggestions. Please be on the alert for your copy of the draft and please have people standing by to begin your company's review as soon as possible. We will telephone you just as soon as we know EPA's timetable.

Mr. Ruckelshaus asked me to advise you that a medical/toxicological review and response will undoubtedly be needed. Please alert the appropriate experts in your company to be ready to participate internally. It is possible that some of them will be needed for the March 19, 20 and 21 meetings, although the NAPCTAC meeting itself will be devoted strictly to air pollution concerns.

Finally, I want to stress that despite the tightness of the immediate timetable we are fortunate to have had the Durham meeting and to be seeing the draft regulation prior to the NAPCTAC meeting.

Cordially,


Ralph L. Harding, Jr.
President

RLH:lj
Enclosure

CC: J. H. Heckman
W. Ruckelshaus

P. S. In the OSHA matter, a new draft of the proposed petition for the Writ of Certiorari is being circulated. Through Keller and Heckman you will be kept posted on developments in that area.

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