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BCP
Borden Chemicals and Plastics

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To: Distribution June 2, 1992
From: R. M. Garner
Subject: Vinyl Institute Annual Meeting - Health, Safety and Environmental Meeting Minutes

On Thursday May 28, 1992 the Vinyl Institute Health, Safety and Environmental Committee held its quarterly meeting. Following are the meeting notes.

I. Opening/Introductions

-J. Ledvina (Vista) has accepted an assignment in Belgium, Frank Jeanson will represent Vista

II. Update on Legal Issues

- A. Fire litigation - most likely the plaintiff will not pursue additional action
- B. Dumping - foreign dumping of PVC has been alleged by Brazil, leading to a 16% tariff increase, increase may become permanent.
- C. California Environmental Impact Report - sponsored in part by VI and the state of California. SRI did the report. Draft and final draft were favorable to industry. CA state Attorney General disagreed with parts of the report, therefore, asked for a change in scope. SRI refused to do additional work at their expense. VI refused to pay more, having contributed more than planned.
- D. Office of Toxic Substances re: EDC producers - will recirculate draft of proposed response.
- E. Derived from Rules - new regulations to be reviewed by a VI subgroup. CMA has been following closely.

III. VCNet - purpose is to enhance the safety of VCM shipments. F. Borrelli is coordinating with the CMA. Tuition is charged for training. A video for safety training will be completed this year. VCSA covers process safety, VCNet covers transportation. Send name of the Safety rep for each company, for a VI contact.

* -DOWS
6/4/92

IV. Safety Subcommittee

V. Roundtable Discussion

- A. Use of non-flammable clothing - several options on weight of fabric and protection offered. Oxychem petro-plants have gone to Nomex. PPG is switching to Nomex clothing by the end of the year. Vista, BCP, and Certainteed do not offer Nomex clothing. Issue: what would visitors wear? BCP cited by OSHA for not providing non-flammable clothing. The group is seeing a change in posture by OSHA, less reasonable, less willing to negotiate.
- B. OSHA Confined Space Regulations - the real question dealt with lock out/tag out procedures. Most members use real locks and tags not just tags. Confined space regs were not the issue.
- C. OSHA EDC PEL - nothing new, last meeting with minutes was 3/91.
- D. Reporting Practices to Federal Agencies - caution on signing broad orders where you agreed to follow NESHAP, can be fined for breaking the order on every release. Include end of order date if possible. The group would like to know the outcome of BCP's OSHA inspection when the final verdict is in.

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NOTE: some companies report everything

BOR 012425

VI. Old Business

- A. Waste Minimization - initiator containers (HDPE) could be sold for recycling. Per DOT the bottles cannot be reused.
- B. Polymerization Plant Scrap - drop from agenda.
- C. Clean Air Act
- D. Hazardous Organic NESHAP - regs to be distributed late this summer. *SARA numbers for EDOG VCM, this released/this produced or sample*
- E. VI Awards program - other alternatives were discussed. VI to gather data before continuing this discussion.
- F. Update of brochure: Facts about Working with PVC - call M. Scheck with comments.
- * G. RVCM data for Uni-Bell. Contact M. Scheck if interested in helping analyze data. **-RMG VOLUNTEERED TO HELP**

VII. New Business

- * A. Multimedia Inspections - group would like to know what to expect, BCP comments on the process and results when negotiations have been completed.
- B. Carpool requirements - for severe and extreme ozone non-attainment areas for employers with 100 or more employees.

VIII. Next Meeting

- Wednesday 9/30/92, in Baltimore, 9am - 2pm