



THE DOW CHEMICAL COMPANY
DOW NORTH AMERICA
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MIDLAND, MI 48674

To: Ron McCreedy

Company : Dow Chemical

Fax Number : -9 1-517-636-9899

Date : 11/3/93

Time : 16:42:44

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Fax Number : 517-636-9899

From : Ron McCreedy

Office Number: 517-636-1824

FAX COVER PAGE

November 3, 1993

to: Vinyl Insitute - EDC/VCM/PVC Quality Team

re: Proposed Teleconference - Monday, 11/8/93 @ 2:00 - 3:30pm EST

Attached are copies of the draft cover letter to transmit the ChemRisk report to USEPA. Also attached are draft copies of cover letters to be used to transmit the ChemRisk report to select print media editors.

I would like to have a teleconference to discuss your (and your company's) approval and/or concerns on these drafts. Also, as a result of recent activities (IJC mtg, Dow/Envr Canada mtg) we may need to revisit our consensus on the plans to distribute the ChemRisk report to these audiences.

As before, I have not been able to check the time with everyone so please respond by fax (517-636-9899) or phone (517-636-1824) and let me know if you are available during the proposed time next Monday. If a majority of the team is not available, I'll try to reschedule for later next week.

Again, thanks for your continued help.

Ron McCreedy

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RLM - 11/9/93

Agenda - Tele conf of VI Task Group

✓ (1) Review last Action Register (8/27/93)

✓ (2) Updates around the industry

✓ (3) Dow/Envr Canada Mtg
(a) critique of Chem Risk
(a) slack Protocol

(4) Use of Chem Risk

(a) Media

(b) EPA

(i) US

(ii) Region VI

(5) Changes to Draft Copy

(a) media

(b) EPA

(6) Protocol for water

(a) industry group working

(7) Industry Program 1st Q.

Ad-hoc Reg/546

- ① Flow diagram (Sent)
- ② Tax Ad-hoc teleconference (Sent)
- ③ Notes D20 shared with industry group. (Sent)
- ④ N. Hydro - 8/93 P. Release (Sent)
- ⑤ Don/Oxy 1/16

VI Dioxin Ad-Hoc Task Group
Teleconference - August 27, 1993

Action Register:

- ✓ 1) Set next teleconference after ChemRisk Report Published and Dow Canada has met with Envr Agencies.
- ✓ 2) Review sending ChemRisk Report to USEPA and EPA Region VI offices with VI Executive Board.
- 3) Set teleconference on: (
 - a) EPA cancer risk assessment protocol (proposed changes - food chain)
 - b) EPA dioxin/furan potency review & impact.)

Attendees: Colin Park, Dow
Jim Knaak, Oxy *N. Falls (716-236-5433)*
Dave Penney, Vista
Jim Barter, PPG
??, Geon

- 4) Does Dow have a protocol for PCDD/PCDF testing of tars? (Jim Lewis, Geon).
- ✓ 5) What sampling will be done in Freeport in the next three weeks by EPA/RCRA to compile with their class action suit?

Ron McCreedy
6-1824

NOV-03-1993 14:13 FROM CHEM & METALS TSSD TO

65858 P.01

Carol M. Browner
Administrator (A-100)
United States Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Greenpeace Study of the Polyvinyl Chloride Industry

Dear Ms. Browner:

The Vinyl Institute, a division of The Society of the Plastics Industry, Inc., represents the majority of polyvinyl chloride (PVC) and vinyl chloride monomer (VCM) manufacturers in the United States. We recently learned of an April 23, 1992, letter sent to you by Greenpeace International. The Greenpeace letter alleges that environmental problems are being created by the release of dioxins and other organochlorines from the production of polyvinyl chloride. We wish to correct certain misleading and unsupported assertions in the Greenpeace document "Dioxin Factories: A Study of the Creation and Discharge of Dioxins and Other Organochlorines from the Production of PVC," which was sent to you.

Because accurate information about the PVC industry and the potential health risks associated with PVC manufacturing is necessary to make sound regulatory decisions, the Vinyl Institute commissioned an independent study of the Greenpeace report. The ChemRisk study details numerous factual errors and unsupported allegations in the Greenpeace report and provides accurate information about the PVC industry.

In addition to the ChemRisk study, we also enclose an August 18, 1993, press release from the Norsk Hydro Plant in Rafnes, Norway, revealing the results of an exhaustive study of dioxin emissions during the manufacture of vinyl chloride at that plant. The 1993 Norsk Hydro study calls into question the very data cited in the Greenpeace report, and shows that actual emissions from the Norsk Hydro plant in Norway are far lower than the those cited by Greenpeace.

The vigilance of the U.S. Environmental Protection Agency together with concerted efforts by U.S. PVC manufacturers have made the United States' PVC manufacturing industry one of the safest and cleanest in the world. We are proud of the progress we have made over the last two decades. PVC production is an essentially closed process which serves as a leader in emissions reduction and waste minimization. Existing U.S. EPA and state

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regulations govern the release of vinyl chloride to the air, water and soils, impose stringent controls on workplace exposure to vinyl chloride, and require the installation of advanced pollution control equipment at vinyl chloride and PVC manufacturing facilities.

The Greenpeace report is dangerously misleading because it's conclusions are based on several incorrect fundamental assumptions. Greenpeace asserts that the PVC industry is a "major new dioxin source" and implies that the dioxin produced by the PVC industry will add significantly to dioxin in the environment. Greenpeace wrongly assumes that because large amounts of chlorine are used in PVC production, large amounts of dioxin necessarily are produced as wastes. Greenpeace's conclusions are based on four fundamental, but flawed, assumptions.

(1) Greenpeace assumes that analytical data from a single vinyl chloride monomer (VCM) facility are representative of data from all VCM/PVC facilities. Much of the Greenpeace report is based on analytical data from a single vinyl chloride manufacturing facility: the Norsk Hydro plant in Rafnes, Norway. Greenpeace extrapolates data from a 1989 survey of dioxin emissions from this plant and applies the data to the entire universe of PVC manufacturing facilities. The 1989 data from the Norsk Hydro plant is not characteristic of industry-wide emissions on a global scale because production processes and emissions control technology differ materially at individual facilities. Greenpeace ignores the emissions control technology and regulatory emissions limitations on all vinyl chloride and PVC facilities in the United States.

(2) Greenpeace assumes that generation of dioxin during VCM manufacturing is synonymous with the release of dioxin into the environment. Greenpeace mistakenly correlates the incidental production of dioxin with the release of dioxin and alarmingly asserts that "manufacture of PVC may be the world's largest single source of dioxin." This statement is without justification or support. PVC manufacture is neither a large source of dioxin production, nor a large source of dioxin emissions into the environment. Very little dioxin goes into wastes, and an even smaller amount is released into the environment. For example, data recorded in 1993 at the Norsk Hydro facility in Rafnes, Norway indicate that while 6.6 grams of dioxins were produced during the manufacture of 425,000 metric tons of VCM, only 0.025 grams were emitted to the atmosphere and 0.006 grams were emitted to the water. Greenpeace ignores countless other sources of dioxin emissions into the environment, and overlooks several independent studies that conclude that non-point source emissions from automobiles and other internal combustion engines are a major source of dioxin emissions into the environment.

(3) Greenpeace assumes that vinyl chloride facilities in heavily industrial areas necessarily were the source of dioxin found in environmental media in those areas. Greenpeace utilizes analytical data from several "case studies" showing the presence of dioxins in environmental media in regions near vinyl chloride facilities to conclude that the vinyl chloride facilities were the source of the dioxins. This conclusion is implausible because it ignores the countless other sources of dioxins in the industrial areas where the samples were taken. Greenpeace's inaccurate reporting of facts (including misstating the location of a vinyl chloride facility) and mischaracterization of the studies' results further undermines Greenpeace's conclusions.

(4) Greenpeace assumes that clinical studies showing an association between chemical worker exposure and increased mortality prove that dioxin caused the increased mortality. Greenpeace mischaracterizes the results of clinical studies of the health risks of dioxins. Greenpeace prematurely concludes that dioxin is a human carcinogen based on evidence from clinical studies that demonstrate an association between chemical worker exposure and increased mortality. Greenpeace's conclusion is fundamentally flawed because none of the cited studies concluded that dioxin was the cause of the increased mortality. Indeed, recent evidence suggests that it dioxin likely is not a human carcinogen at the low doses found in environmental exposures.

* * * * *

Responsive to the Clean Air Act Amendments of 1990, EPA is reviewing the vinyl chloride standard and ensuring that maximum achievable control technology (MACT) is required. Current Agency rulemakings, together with continued industry commitment to environmentally responsible manufacturing, will provide ample protection against potential health threats. The fundamental flaws in the Greenpeace report cast doubt on its credibility and obviate the need for additional Agency action.

The Vinyl Institute and the industry it represents remain committed to working with the Agency to provide essential PVC consumer products in an efficient, environmentally safe manner. We welcome your questions and look forward to continued cooperation in the future.

Sincerely yours,

Attachments

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