

TO: H. D. Garrison, R. A. Conrad, J. Friend

FROM: J. C. Ledvina  
DATE: January 27, 1988

Interoffice  
Communication

SUBJ: VINYL CHLORIDE MUTUAL ASSISTANCE PROGRAM

VIST

The attached correspondence confirms that there is no longer a VCM Mutual Assistance Program. Transportation incidents involving VCM will be handled in the same manner as other chemicals in the CHEMTREC system.

*J. C. Ledvina*  
J. C. Ledvina

ajo  
.201

Attachment

VVV 000028645

149



*A Division of The Society of The Plastics Industry, Inc.*

**Dear Customer,**

**Because of the condition of the original, this is the best copy that could be made.**



**To: The VI Health, Safety and Environment Committee  
The VI Legal Committee**

**Re: Vinyl Chloride Mutual Assistance Program**

**The attached correspondence between Joe Mayhew of CMA and Peter de la Cruz should serve to complete your files on the above-referenced program.**

**Meredith N. Scheck  
Assistant Director**

**MNS/pmb  
enclosure**

VVV 000028646

LAW OFFICES  
**KELLER AND HECKMAN**

1150 17<sup>TH</sup> STREET, N.W.  
SUITE 1000  
WASHINGTON, D.C. 20036  
—  
(202) 956-5600

JOSEPH E. KELLER  
JEROME H. HECKMAN  
CHARLES M. MEEHAN  
WILLIAM H. BORGHERANI, JR.  
MALCOLM D. MACARTHUR  
WAYNE V. BLACK  
TERRENCE D. JONES  
MARTIN W. BERCOVICI  
JOHN S. ELDRED  
FREDERICK A. PROVORNY  
CAROLE C. HARRIS  
MICHAEL F. MORRONE  
MARK FOX EVANS  
JOHN B. DUBOCK  
PETER L. DE LA CRUZ  
CHRISTINE A. NEAGHER  
SHIRLEY S. FUJIMOTO  
LAWRENCE P. HALPRIN  
RALPH A. SIMMONS  
PETER A. SUSER  
C. DOUGLAS JARRETT

SHEILA A. MILLAR  
MARY MARTHA MCANAHARA  
JOHN B. RICHARDS\*  
MELVIN S. OROZEN  
FREDERICK J. DAY, JR.\*\*  
MARGIE E. GREENSTEIN\*  
SUSAN T. CONTI  
SUSAN J. FISHER  
PATRICK J. HURO\*\*  
S. CRAIG TAUTFEST  
DAVID M. JETT  
MAUREEN A. O'CONNELL\*\*  
KAREN E. EDELBERG\*  
NINA M. SINSTEIN\*\*\*  
MARK A. SIEVERS\*\*\*  
MARY CHAMBERS GRANDT\*\*  
G. FRANKLIN KOONTZ\*\*  
CATHERINE N. ROEMER\*\*  
ROBERT JEFFREY EBER\*\*\*\*  
RICHARD A. JAFFE\*

\*ADMITTED IN PENNSYLVANIA ONLY  
\*\*ADMITTED IN VIRGINIA ONLY  
\*\*\*ADMITTED IN MARYLAND ONLY  
\*\*\*\*ADMITTED IN COLORADO ONLY

SCIENTIFIC STAFF  
DANIEL S. DIXLER  
DURWARD F. DOOGEN  
CHARLES V. BREDER  
ROBERT A. MATHEWS

TELECOMMUNICATIONS  
ENGINEER

CHARLES F. TURNER

TELEX  
48 95581

TELECOPIER  
(202) 296-7682

CABLE ADDRESS "KELMAN"

WRITER'S DIRECT DIAL NUMBER

January 14, 1988

(202) 956-5641

Meredith M. Scheck  
The Vinyl Institute  
Wayne Interchange Plaza II  
155 Route 46 West  
Wayne, New Jersey 07470

Re: Vinyl Chloride Mutual Assistance Program

Dear Meredith:

I received the enclosed response from Joe Mayhew confirming that CHEMTREC has discontinued the Vinyl Chloride Mutual Assistance Program. It would be appropriate to distribute this letter to the Legal Committee and Health, Safety, and Environment Committee so that the members' files will be complete.

If you have any comments or questions, please let me know.

Cordially yours,

*Peter*  
Peter L. de la Cruz

Enclosure

cc: Robert D. Luss, Esq.  
W. C. Holbrook  
Charles E. O'Connell  
Robert W. Sherman

VVV 000028647



## CHEMICAL MANUFACTURERS ASSOCIATION

January 7, 1988

Mr. Peter L. de la Cruz  
Keller and Heckman  
1150 17th Street, NW  
Suite 1000  
Washington, DC 20036

Dear Mr. de la Cruz:

Thank you for your correspondence of December 30 regarding the Vinyl Chloride Mutual Aid Assistance program.

We recognize this program was never formalized, and that it was more of a "gentlemen's" agreement among the producers involved. However, during the years it was active, the program was one of the better tools CHEMTREC was able to use to the industry's advantage. Quite often during a train derailment actual shipper identification is impossible to obtain at the time of initial call to CHEMTREC. It was quite valuable to have this resource for VCM response available during such instances.

During the later part of 1986, an attempt was made by us to revive the program. Each listed member was approached and asked to indicate his preference to one of three options. They were: 1) continue and reorganize the VCM plan to reflect the SPI withdrawal from sponsorship of the plan; 2) incorporate the VCM plan into the CHEMNET program; and 3) disband the VCM mutual aid plan without additional action. The majority preferred to disband.

Although our records were modified to indicate that the VCM plan no longer existed, some references remained in our operations manual and thus a recent attempt was made to activate the system.

Please be assured all files and references to this voluntary program have been removed from our operational files.

Sincerely,

Joe J. Mayhew  
Director, National Chemical  
Response and Information  
Center (NCRIC)

JJM/ejf

LAW OFFICES  
**KELLER AND HECKMAN**

1150 17<sup>TH</sup> STREET, N.W.  
SUITE 1000  
WASHINGTON, D.C. 20036  
  
(202) 956-5800

JOSEPH E. KELLER  
JEROME H. HECKMAN  
CHARLES W. HECKMAN  
WILLIAM W. BORGHESE, JR.  
MALCOLM D. MACARTHUR  
WAYNE V. BLACK  
TERRENCE D. JONES  
MARTIN W. BERCOVICI  
JOHN B. ELDRED  
FREDERICK A. PROVORNY  
CAROLE C. HARRIS  
MICHAEL F. MORRONE  
MARK FOX EVENS  
JOHN B. GUSECK  
PETER L. BELL CRAIG  
CHRISTINE A. HEADNER  
SHIRLEY S. FUJIMOTO  
LAWRENCE P. HALPRIN  
RALPH A. SIMMONS  
PETER A. BUSBER  
C. DOUGLAS JARRETT

SHEILA A. MILLAR  
MARY MARTHA MCNAMARA  
JOHN S. RICHARDS  
KELVIN S. OROZEN  
FREDERICK J. DAY, JR.  
MARCI E. GREENSTEIN  
SUSAN T. CONTI  
SUSAN J. FISHER  
PATRICK J. HURD  
S. CRAIG TAUTFEST  
DAVID H. JETT  
MAUREEN A. O'CONNELL  
KAREN E. EDLBERG  
NINA M. SIKSTEIN  
MARK A. SIEVERS  
MARY CHAMBERS GRANDY  
G. FRANKLIN KOONTZ  
CATHERINE N. ROEMER  
ROBERT JEFFREY EBER  
RICHARD A. JAFFE

\*ADMITTED IN PENNSYLVANIA ONLY  
\*\*ADMITTED IN VIRGINIA ONLY  
\*\*\*ADMITTED IN MARYLAND ONLY  
\*\*\*\*ADMITTED IN COLORADO ONLY

SCIENTIFIC STAFF  
DANIEL S. OXLER  
DURWARD F. OODGEN  
CHARLES V. BREDER  
ROBERT A. MATHEWS

TELECOMMUNICATIONS  
ENGINEER  
CHARLES F. TURNER

TELEX  
49 88861

TELECOPIER  
(202) 296-7682

CABLE ADDRESS "KELMAN"  
WRITER'S DIRECT DIAL NUMBER

December 30, 1987

RECEIVED

JAN 4 1987

DR. R. T. GOTTESMAN

(202) 956-5641

Mr. Joe J. Mayhew, Director  
National Chemical Response  
and Information Center  
Chemical Manufacturers Association  
2501 M Street, N.W.  
Washington, D.C. 20037

Re: Vinyl Chloride

Dear Mr. Mayhew:

I am writing on behalf of the Vinyl Institute, a division of The Society of the Plastics Industry, Inc. (SPI), concerning response procedures for incidents involving vinyl chloride. This letter is intended to confirm the propriety of the Chemical Transportation Emergency Center's (CHEMTREC) current handling of vinyl chloride in the same manner as other chemicals.

In 1976, an SPI division known as the "VCM/PVC Producers Group" met and attempted to create an emergency response plan for incidents involving vinyl chloride under which the producers would respond to accidents located closest to their facilities regardless of the actual manufacturer or shipper. This was sometimes referred to as the VCM Voluntary Emergency Response Program and also the Vinyl Chloride Mutual Assistance Program. Participants in this program included Borden Chemical Company, Conoco Chemicals, Diamond Shamrock Chemical Company, Dow Chemical Company, General Tire and Rubber Company, BFGoodrich Chemical Company, Goodyear Tire and Rubber Company, Great American Chemical Company, Hooker Chemical and Plastics Company, PPG Industries, Shell Chemical Company and Stauffer Chemical Company. These companies and others may have written to

VVV 000028649

Mr. Joe J. Mayhew  
December 30, 1987  
Page Two

KELLER AND HECKMAN

CHEMTREC in 1976 and 1977 authorizing CHEMTREC to release the company's name and telephone numbers and the location of response teams when, in CHEMTREC's judgment, the company's response personnel were in a geographic position to render aid most effectively.

Although well-intentioned, this mutual assistance program did not work as a practical matter. We understand that CHEMTREC voluntarily retired the files relating to this program some years ago. Since the initial attempts to organize the program, the industry has undergone substantial consolidation. This, accompanied by shifts in the geographic distribution of production facilities, have also minimized the underlying rationale for the program. Moreover, since there is no universally-followed standard for equipment coupling, technical obstacles to an effective mutual response program exist.

We trust that this letter will adequately summarize the reasons for CHEMTREC's discontinuance from the program and serve as a file memorandum rescinding any company authorizations. If you have any comments or questions, please let me know.

Sincerely,

*Peter L. de la Cruz*  
Peter L. de la Cruz

cc: Robert D. Luss, Esq.  
W. C. Holbrook  
Herb Waltemate  
Charles E. O'Connell  
Robert W. Sherman  
Roy T. Gottesman, Ph.D.

VVV 000028650