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June 26, 1979

Joseph E. Hadley, Esq.
Keller & Heckman
Suite 1000
1150 17th Street, N.W.
Washington, DC 20036

Re: EDF Compromise Proposal

Dear Joe:

Pursuant to instructions from the Polyvinyl Chloride Safety Group (Group) at our last meeting in New York on March 30, 1979, I arranged a meeting with Counsel for EDF to determine with greater specificity what EDF was proposing for SPI's consideration.

Counsel for EDF started the meeting by saying his organization would like to meet jointly with SPI and EPA and reach a comprimise. If a compromise was reached, EPA could be persuaded, according to EDF, to withdraw the existing amendment to the National Emission Standard for Vinyl Chloride issued on June 7, 1977 and propose and promulgate the new amendment as represented by the compromise. EDF's proposed compromise includes three points, and they are:

1. Reduce fugitive emissions by at least 50 percent. Our members would agree to identify the potential sources of fugitive emissions, install fixed monitors to confirm the sources, then establish a program and implement it to reduce the emissions as quickly as possible;

2. Adopt a program to reduce the number of upset conditions which lead to possible high short-term emission levels; and

3. Acceptance of the trade-off or offset policy for Section 112. EDF wants the emissions to never exceed what they are now. Each time a facility is expanded the combined emissions from the plant

and its expansion would not be allowed to exceed those being emitted before construction was initiated.

I advised Counsel that I would forward his proposals in writing to our Chairman and you and would get back to him as soon as we had a decision. I also suggested that I thought it would be difficult for the Group to accept proposal #3 and he replied that EDF had invested a lot of time and effort in trying to establish precedents in the Vinyl Chloride case and was still willing to litigate the issues if some kind of agreement could not be reached. Further EDF Counsel indicated his lack of satisfaction on the progress and substance in the proposed airborne carcinogen policy presently being developed by the staff at Research Triangle Park. Because of this dissatisfaction and if this compromise effort fails, EDF will litigate the Vinyl Chloride or Arsenic Standards to achieve its long sought goals and policies according to Counsel.

For information purposes only I am including a copy of page 33334 of the June 8, 1979 Federal Register. The enclosure is self-explanatory, but as I told you on the telephone Susan Wyatt advised that EPA would move to regulate EDC, Perchloroeythlene Acrilonitrile and coke oven emissions under Section 112 as soon as the airborne carcinogen policy is set. These substances are in addition to those listed in the Federal Register.

If you have any questions, please advise.

Cordially,

Gary H. Baise

GHB:jrn

Enclosure

SURVEY RESULTS

Average Residual Monomer Levels For Suspension Resins After Stripping

Homopolymer

High Molecular Weight

Current	Range	550-100 ppm
	Average	237 ppm
Future	Range	550-50 ppm
	Average	241 ppm

Low Molecular Weight

Current	Range	382-1 ppm
	Average	167 ppm
Future	Range	382-< 1 ppm
	Average	135 ppm

Copolymer

More than 10% Comonomer

Current	Range	350-300 ppm
	Average	333 ppm
Future	Range	350-200 ppm
	Average	300 ppm

Less than 10% Comonomer

Current	Range	400-213 ppm
	Average	320 ppm
Future	Range	346-213 ppm
	Average	286 ppm