



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

le: Goodrich
Roy T. Gottesman
Executive Director

April 23, 1987

Mr. David Hall, President
Geon Vinyl Division
BFGoodrich Company
6100 Oak Tree Boulevard
Cleveland, Ohio 44131

Dear Dave:

As you know, we have been working with the Environmental Protection Agency to try to resolve certain definitional issues on the Vinyl Chloride Standard.

As progress was painfully slow, Peter de la Cruz recently asked Gerry Bjornson of your Washington Office to see if she might be of assistance in obtaining a response to our proposal for language changes to resolve these definitional issues.

I enclose a copy of a letter from Peter de la Cruz relating to this and I want you to know that we sincerely appreciated Gerry Bjornson's effort in helping here. On Friday, April 17th, we finally did receive EPA's proposals which are now being reviewed by both the Health, Safety and Environment and Legal Committees of the Institute. Hopefully, we will be able to resolve this shortly.

Sincerely yours,

RTG/pmb
enclosure
cc: D. Neale
bcc: G. Bjornson
P. de la Cruz

SPI-07716

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April 6, 1987

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APR 10 1987

DR. R. T. GOTTESMAN

Roy T. Gottesman, Ph.D.
The Vinyl Institute
Wayne Interchange Plaza II
155 Route 46 West
Wayne, New Jersey 07470

Re: 1986 Amendments to the Vinyl
Chloride Standard

Dear Roy:

This letter provides a brief update on the status of settlement negotiations with the Environmental Protection Agency (EPA) on five definitional issues in the vinyl chloride Clean Air Act standard. Although we provided suggested settlement language to EPA in mid-February, the Agency has yet to respond to our proposal. The Agency staff attributed this delay to necessary communications and decision making within EPA.

Recently, I indicated that Gerrie Bjornson, BFGoodrich's Director of Government Relations, had discussed the possibility of putting pressure on EPA to act by obtaining congressional inquiries. After some discussion, Gerrie and I agreed that it would be better for her to begin by contacting EPA to obtain a commitment date for action before soliciting congressional interest. Gerrie was very successful in striking a responsive cord from the attorneys at EPA and the Justice Department. Richard Roos-Collins, of the EPA's General Counsel's Office, called me after his discussions with Gerrie and promised to contact me later this week to establish a meeting during the week of April 13 to review EPA's response. He again expressed his opinion, which I believe to be sincere, that we would be pleased with EPA's response. In any event, Gerrie's efforts here proved quite helpful.

SPI-07717