



OFFICE OF
THE DIRECTOR

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

FEB 12 1973

REFER TO
CC-16,296 T:KSM

Jerome H. Heckman, Esquire
Keller and Heckman
1150 17th Street, N.W.
Suite 1000
Washington, D.C. 20036

Dear Mr. Heckman:

This refers to your request of January 29, 1973, as counsel for The Society of the Plastics Industry, Inc., for a copy of a report recently prepared for the Bureau by Bailie Associates, which relates to the environmental impact of polyvinyl chloride plastic as a container material for distilled spirits.

As you know, the Draft Environmental Impact Statement of the Bureau of Alcohol, Tobacco and Firearms regarding the use of polyvinyl chloride plastic for the manufacture of liquor bottles was made available to the public in February of 1972. The study mentioned above, which is currently being used in the preparation of our Final Environmental Impact Statement on this question, will be made available to the public in the near future. We anticipate that the report by Bailie Associates will be referenced in the impact statement and made available through the National Technical Information Service of the Department of Commerce.

You will be advised further on this matter.

Sincerely yours,

Rex D. Davis
Rex D. Davis

SPI-23744

February 20, 1973

Michael L. Flanagan, Esquire
Van Valkenburg and Comaford
2350 IDS Center
Minneapolis, Minnesota 55402

Re: SPI-PAC-Minnesota

Dear Mike:

Primarily as a "for your information" item, and while I continue to await any additional information you are able to give us on all of the situations of interest to The Society of the Plastics Industry in Minnesota, I am herewith enclosing a copy of a letter one of my associates, Peter Nemkov, had occasion to write to Mr. Samuel J. Rupert (a member of the SPI Plastic Bottle Division) as a follow-up to a telephone report Mr. Rupert gave Peter while I was away last week.

I am not certain that there is really anything you need to do about the situation reflected in Peter's letter but if you can cast any more light on the problem, it would obviously be of interest to me. It goes without saying that Sam's report to Peter certainly confirms the opinions you have already given me about the activist role the Pollution Control Agency is playing in your State. I cannot help but wonder whether this is really what the people of Minnesota have in mind as proper activity for such a governmental agency because it seems to me that it is not acting as a dispassionate arbiter, but much more like an advocate of a simplistic point of view.

Any comments you care to give us on the situation would be of great interest.

Cordially yours,

Enclosure

cc: Messrs. Harding, Clarkson, Michel, Nuspliger,
McGrath, Formo, Haley, Kiss, Sherman and
Rupert

JHH:nr

SPI-23745