



Robert H. Burnett
Executive Director

August 25, 1994

TO: VI Executive Board

RE: EPA Letter

Following review by our Chair, Bill Patient, and a Special Task Force of the Vinyl Institute, I have sent the attached letter to Dr. Lynn Goldman of the EPA.

This followed a series of personal contacts with high level managers at the agency and a consensus that the vinyl industry needs to step forward and be a "player" in the dioxin debate.

We will be following up on those visits as appropriate and you will be further briefed on developments at the September 13 Board meeting.

RHB/pmb

cc: Issues Management Committee

J. Svalander, ECVI

P. de la Cruz, K&H

N. Jacobs, EH&Co

T. Termine, N-D

B. Lienhart, CCC

M. Axsmith, CSPI

L. Freeman, SPI

M. Healey, SPI

CTL014344

65 Madison Avenue • Morristown, NJ 07960 • (201) 898-6699 • Fax # (201) 898-6633

The original copy of this document printed on recycled paper



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

Robert H. Burnett
Executive Director

August 23, 1994

Dr. Lynn Goldman
Assistant Administrator
Prevention, Pesticides and Toxic Substances
U.S. Environmental Protection Agency
401 M Street, SW, room E 637
Washington, D.C. 20460

Dear Dr. Goldman:

I want to thank you again for taking the time to meet with me on August 10th and particularly appreciate your interest in getting the vinyl industry's input to the pending dioxin reassessment.

As part of the CMA/CCC program, we have reviewed the available data regarding the potential generation of dioxin during the vinyl production and product-use lifecycle -- much of which has been collected to date in Europe. That review leads us to conclude that the vinyl industry represents, at most, a minimal contribution to overall dioxin levels in the United States. Nevertheless, we are aware of the EPA's concern and are committed to further characterizing those levels. Should those evaluations reveal any problematic points in the production and use process, we are also prepared to embark on a program that would reduce those amounts, employing comparative risk as one of the tools for priority-setting in making those reductions.

Let me emphasize the vinyl industry's sincere interest in working with the EPA on this issue. Please let me know if you would like to discuss further any of the points we covered on the 10th.

Sincerely,

RHB/pmb

CTL014345