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To: SPI-PVC Safety Group
SPI-PVC Manufacturing Technology
Committee
SPI-PVC Communications Committee
SPI-PVC Lawyers Subcommittee

Ladies and Gentlemen:

Enclosed herewith is a retyped copy of a memorandum from the Environmental Protection Agency Office of Enforcement in Washington, D. C. to the Chief of the Enforcement Branch of Region I. This document, supplied to us by Harvey Rosenzweig of Borden's Law Department, represents the latest thinking of EPA relative to emergency relief valve discharges. It was retyped in our offices because the copy sent to us was not sufficiently legible for photocopying.

Suffice it to say, the bottom line of this memorandum is that "... in developing the vinyl chloride regulations [EPA] envisioned the use of gasholders to prevent or contain relief valve discharges. Therefore, ... PVC manufacturers can reasonably be expected to install gasholders to prevent discharges if other preventative measures, implemented in a timely manner failed."

We have been in touch with Gary Baise relative to this memorandum and its implications and will soon be in touch with you relative to what course of action we recommend be taken with regard to it.

Cordially yours,

Enclosure

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