U.S. Consumer Product Safety Commission LOG OF MEETING

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SUBJECT: Requested meeting by The Vinyl Institute Staff

DATE OF MEETING: 6/14/2007

LOG ENTRY SOURCE: Joanna Matheson

DATE OF LOG ENTRY: 7/9/2007

LOCATION: U.S. Consumer Product Safety Commission, Bethesda, MD

CPSC ATTENDEE(S): Jacquie Elder, Mary Ann Danello, Lori Saltzman, Michael Babich, Kris Hatlelid, Joanna Matheson, Joel Recht, Mary Toro, Frank Krivda, Jason Hartman

NON-CPSC ATTENDEE(S): Randy Schumacher (Schumacher Partners International, LLC), Frank Borrelli (The Vinyl Institute)

SUMMARY OF MEETING: Representatives of the Vinyl Institute visited CPSC to explain the different technologies and processes involved in manufacturing vinyl products.

• The Vinyl Institute's members are primarily manufacturers of resins. They will also make compounds to customer specifications (specs) as well as additives. Most resins are not exported to the US; the vinyl is imported as final products.

• An overview was provided on lead in vinyl. Considerations to take into account for vinyl consumer products in which lead has been detected is whether the lead is from pigments, or has been intentionally added or is a contamination problem from work carried out in other sections of the factory particularly if Good Manufacturing Practices (GMP) have not been followed. It was stated that when total lead levels in a product are low then the lead source is not likely to be from a stabilizer.

• Background information was given on the use of lead as a stabilizer. Stabilizers are in many products to reduce UV aging.

• Different kinds of stabilizers are used for vinyl sheeting. In the US, organic tin is typically used for rigid sheeting (an example of rigid sheeting would be PVC pipes). For flexible sheeting, typically multiple metals are used as well as calcium and zinc. Windows and siding usually use tin. NSF International tests pipes for the presence of heavy metals as well as migration of monomers into drinking water.

• For pigments there must be a stabilizer and usually only one stabilizer is used. If a product is found to contain lead and if that lead is both water and acid soluble then the lead is more likely of the carbonate type. Lead carbonate is the typical form found in lead pigments.

• In the past two years organic stabilizers have been developed. The efficiency of these organic stabilizers is not well-defined. Lead stabilizers are a little less expensive than the non-metal stabilizers.

• The manufacturing process is 99% efficient but there is some recycling occurring in the vinyl manufacturing process. Scraps may go through a second heating. Scraps can be granulated and resold. There is some post-consumer recycling; this is seen with rigid PVC, with pipes being taken back. The recycling will depend on the quality of the materials. It is also more difficult to recycle vinyl that is colored.