

Date 20 October 1982

INTEROFFICE
MEMORANDUM

Subject Changes to EPA Standard for Vinyl
Chloride

To Distribution

From J. T. Barr

(Location, Organization, or Department)
Regulatory Response

(Location, Organization, or Department)

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LAW DEPT.

The Manufacturing Technology Committee of the SPI VC-PVC Producers Group met in Cleveland on 19 October to review the response by EPA to our earlier letter supporting changes in the VC standard. Comments were prepared and persons were assigned to act as discussion leader for each point. A detailed agenda was prepared for the meeting with EPA at RTI on 10 November. Industry positions were essentially unchanged from prior reports, except that it was decided to drop any other limiting criteria from the 100 lb de minimus exceptions for discharges, and ask for discharge size as the only criterion.

Several other items of interest were discussed during the day. These are summarized below.

Enforcement:

Goodrich is attempting to avoid filing of another civil suit at their Louisville plant by negotiating a settlement with Region IV. The Calvert City case is in obeyance pending this discussion. They have met with the EPA contractor who is evaluating their response to the Sec. 114 letter at Plaquemine, and their Pedrichtown - Sec. 114 response also has been referred to a contractor.

Shell also has met with the contractor concerning the Sec. 114 letter for their Norco plant, and expects a plant visit in November.

Conoco also expects a visit in November, and has been told that contractor reports will be early in January. They expect action from Region IV also.

Ethyl lawyers are discussing their case with Region VI counsel.

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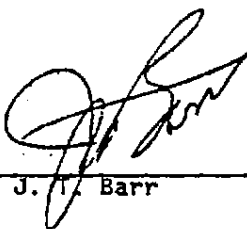
Hooker has no actions active at this time, but two old Sec. 114 letters are outstanding.

Wastes:

Goodrich stated that they had reviewed a letter from Kentucky regarding the closed BFG/Airco landfill, and had thought that "we" should have gotten one, also. It is not clear if "we" is Airco or Air Products. The State selected it as one of 22 sites which scored the "best" in the 100 sites surveyed, and have recommended all 22 to Superfund for action.

In-Service:

In a general discussion of the meaning of "in vinyl chloride service", it was agreed that both liquid and vapor phases must be considered, and that a tank with a VC-rich vapor must be termed in-service. Several companies have had this question raised, and all agreed on that conclusion.



J. T. Barr

JTB: csm

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