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August 5, 1980

Jerome H. Heckman, Esquire
Keller & Heckman
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Re: Meeting with TRW and Office of Air Quality Planning
and Standards Staff

Dear Jerry:

On June 17, 1980, members of the Manufacturing Technology Committee (Committee) of the PVC Safety Group were invited by the Office of Air Quality Planning and Standards (OAQPS) to attend a meeting with them and TRW, an EPA contractor, in Durham, North Carolina to discuss EPA's plans to initiate a review of the National Emission Standard for Vinyl Chloride. The purpose of the meeting was to review present and future activities EPA and TRW are planning with respect to possibly revising the vinyl chloride standard. A copy of the EPA-TRW agenda and the attendees is attached.

A conference of the members of the Manufacturing Technology Committee was held prior to the meeting. It was determined that the general strategy would be to listen to what EPA and TRW had to say, ask clarifying questions regarding the proposed activity and send a signal suggesting we are not pleased with the Agency proceeding to revise the standard when the facts indicate there is no health information demonstrating any need for the type of review being suggested by the Agency and TRW.

~~Don Goodwin, Director of Emissions Standards and Engineering Division, EPA, opened the meeting by suggesting that EPA was under a statutory mandate to review its standards every five years. It was suggested to Mr. Goodwin that there was no statutory mandate of this nature which was subsequently confirmed by his staff. In addition, Mr. Goodwin suggested that EPA was~~

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under pressure from the Environmental Defense Fund (EDF) to review the standard and make it more stringent. He felt that a review would be helpful to the Agency in its efforts to fend off the environmentalists, particularly if the study indicated that nothing further needed to be done. ~~Mr. Goodwin made it clear that his office was only responsible for general technology issues and had no authority to look at health issues and, of course, we agreed that technically this was correct; however, we strongly suggested that Mr. Goodwin and EPA should consider conducting a health study before proceeding with this particular effort.~~

Mr. James Bodamer, TRW project officer, indicated his firm has already initiated its review of the vinyl chloride standard. To date, that review includes a review of the technological literature and scheduling of plant visits. TRW wants to determine what the enforcement experience has been with respect to the existing standard. A majority of the project time will be expended on determining the difficulty sources have had with respect with complying with the standard. Less time will be spent on looking at new technologies. The project could last two years, but at this time TRW is in the first phase which will be completed in October or November. If it is determined after the first phase that the vinyl chloride standard needs no revision then TRW will not proceed further; however, both TRW and EPA staff suggested that changes might be made which would make the standard easier to comply with and, therefore, it is in our interest to work closely and cooperatively with them.

TRW, in addition to undertaking the literature review and plant visits, will update the original Vinyl Chloride standard support document which the Agency published in 1975. Also, a questionnaire is being prepared which will be utilized during the meetings at the plants. The Committee asked that the questionnaire be sent to the plants before the scheduled visit so the meetings will be more meaningful. It was suggested to EPA staff that companies will make their personnel available to talk to the TRW representatives, but no one wants to allow TRW to have total access to files and records in the plant. When the TRW staff is visiting the plants, state people will be invited to attend if the Section 112 authority has been delegated to the

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state. It was requested that TRW be able and willing to sign secrecy agreements when they come to visit and they are willing to do so. A trip report will be prepared by TRW and will be available to the company for review.

In addition to the enforcement information TRW will obtain from plant visits it will be looking at existing and new technologies which may be applied to other vinyl chloride sources which were exempted from the original standard. New sources which were not considered in the original vinyl chloride standard support document will also be examined for possible regulation.

Representatives from our Committee raised issues TRW should examine and review and they are as follows: the malfunction provisions, reporting requirements because of the existing variations found at the regional offices, and permitting procedures because there is duplication among NESHA's NSPS and PSD and Offset review.

The meeting ended on a generally cordial note; however, I believe the Agency and particularly Don Goodwin were acutely aware of our concern that this effort was quite unnecessary in light of the existing facts.

Sincerely yours,

Gary H. Baise

GHB/tlc

Attachments

SCC
4-0033

VINYL CHLORIDE REVIEW STUDY
SOCIETY FOR THE PLASTICS INDUSTRY
MEETING AGENDA
JULY 31, 1980

I. PURPOSE OF MEETING

- A. Discussion of TRW/OAQPS Project Work Plan
 - Current status of review study
- b. SPI Involvement with Air Emission Standards Development
 - Input to vinyl chloride review study

II. REVIEW STUDY AREAS OF CONCERN

- A. Control Technology
 - Existing and new technologies
- B. Existing Sources Not Under Existing Standard
 - Other industrial sources (fabricators, other resin producers, etc.)
 - Storage and transportation methods
- C. New Sources of Vinyl Chloride
- D. Enforcement Experience with VC NESHA
 - Enforcement problems identified by EPA Division of Stationary Source Enforcement and Regional Offices
 - Problems identified by industrial sources
 - Suggestions for resolution

III. INFORMATIONAL SOURCES

- A. TRW/OAQPS Approach to Information Collection
- B. SPI Information Sources
- C. Other Sources

IV. CONCLUSIONS/ACTION ITEMS

- EPA taking position that they are required to review ^{4 or 5 years} (questionable)
- VCM emission standard
- EDF is putting pressure on to tighten standard
- TRW is the review contractor

What technology is in place

Have started study
Going through Regional EPA office records
Are starting plant visits now

Going to DOW and Diamond as
VCM producers.

Also going to PVC producers also.

Will make recommended changes in
VCM standard