



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

January 19, 1990

TO: Vinyl Institute Health, Safety and Environment Committee

RE: Annual Environmental Recognition Program
Respond By March 1, 1990

As you know, the Vinyl Institute Annual Environmental Recognition Awards have been given for the past 2 years. Now, we need to think ahead!

Please use the attached calculation instruction sheet and provide your calendar year 1990 information to me on the enclosed sheet by March 1, 1990.

Presentations will be made at the Vinyl Institute May 1990 Annual Meeting to the first and second best performing plants in both the VCM category and the PVC category.

Thank you for your attention to this matter.

Meredith N. Scheck
Assistant Director

MNS/pmb
enclosure

R&S147924

VINYL INSTITUTE
HEALTH, SAFETY & ENVIRONMENT
ANNUAL ENVIRONMENTAL RECOGNITION AWARD
CALCULATION INSTRUCTIONS

Annual recognition is given to the first and second best performing plants in both the PVC category and the VCM category. Performance is measured basically pursuant to USEPA's VCM NESHAP Standard and specifically calculated as follows:

$$\text{PVC Plant Performance Index} = 100 - \left[\frac{(\text{RVCM Exceedances})}{(\text{E RVCM Measurements})} \times 100 \right] - \left[\frac{(\text{ROL Exceedances})}{(\text{E ROL Measurements})} \times 100 \right] - \left[\frac{(\text{VG Exceedances})}{(\text{E VG Measurements})} \times 100 \right] - \text{RD} - \text{RV} - \text{NV} - \text{Bypass Events}$$

$$\text{VCM Plant Performance Index} = 100 - \left[\frac{(\text{VG Exceedances})}{(\text{E VGM Measurements})} \times 100 \right] - \left[\frac{(\text{Oxy RX Exceedances})}{(\text{E Oxy RX Measurements})} \times 100 \right] - \left[\frac{(\text{VG Bypass Hours})}{(\text{E VG Operating Hours})} \times 100 \right] - \text{RV} - \text{RD}$$

Notes:

The calculation period shall be for the calendar year.

2. RVCM Exceedances = The number of times the levels specified in 40 CFR 61.64(e)(1) (i) and (ii) were exceeded. See also 40 CFR 61.67(c)(2)(v). Failure to sample and analyze for RVCM shall be classified as an exceedance.
3. E RVCM Measurements = The number of days a 24-hour weighted average RVCM is determined. For a plant which produces only a single type resin this number should equal the plant operating days and cannot exceed 365. For multiple type resin plants this number shall be the sum of the days of all types.
4. ROL Exceedances = The number of times the level specified in 40 CFR 61.64(a)(2) was exceeded as determined by 40 CFR 61.67(g)(5). Failure to confirm emission limit attainment shall be considered as an exceedance.
5. E ROL Measurements = The sum of the number of reactor openings.
6. VG Exceedances = The number of vent gas emissions reportable pursuant to 40 CFR 61.67(c)(1) as such applies to PVC plants for PVC plants and as such applied to VCM plants for VCM plants. Failure to measure shall also be classified as an exceedance.
7. E VG Measurements = The sum of the number of hours the vent gas emission control device(s) was operating.

8. Oxy RX Exceedance = The number of times the oxychlorination reactor emission to the atmosphere exceeds the level specified in 40 CFR 61.62(b) and as reportable pursuant to 40 CFR 61.70(c)(1). Failure to measure shall be classified as an exceedance.
9. E Oxy Rx Measurements = The sum of the number of hours oxychlorination was operating.
10. RV = The number of relief valve discharges pursuant to 40 CFR 61.65(a) except that an emergency relief discharge as defined therein shall also be classified as an RV. A relief valve discharge to a flare shall be classified as an RV.
11. MV = The number of manual vent valve discharges pursuant to 40 CFR 61.64(a)(3) except that an emergency manual vent valve discharge as defined therein shall also be classified as an MV. A manual vent valve discharge to a flare shall be classified as an MV.
12. RD = The number of rupture disc discharges to the atmosphere or to a flare.
13. A RD and RV in series shall be considered as only one event when a discharge occurs.
14. RV and RD leaks are not to be counted.
15. Bypass Events - The number of times a vent gas control devices is bypassed to the atmosphere or to a flare stack.

VG Bypass Hours = The number of hours a vent gas control device in a VCM or EDC plant is bypassed to the atmosphere or to a flare stack. Note that if a VG bypass occurs, the exceedance is counted in this term and not in the VG exceedance term (see #6).
17. VG Operating Hours = E VG Measurements (see #7).
18. In January of each year, each Vinyl Institute member company PVC/EDC/VCM plant shall submit their calculated performance index (through their Vinyl Institute Health, Safety and Environment Committee Member) to the Vinyl Institute.

VINYL INSTITUTE ANNUAL ENVIRONMENTAL RECOGNITION
CALENDAR YEAR 1989

PLANT LOCATION (CITY/STATE)	PVC PLANT / EDC/VCM PLANT	PERFORMANCE INDEX

Return By MARCH 1, 1990 To:

Meredith N. Scheck
The Vinyl Institute
Wayne Interchange Plaza II
155 Route 46 West
Wayne, New Jersey 07470

Responder

Company

Telephone Number

R&S147927