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THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

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MAR 13 1975

MINUTES

VCM and PVC Producers Group

EPA Steering Committee

Keller and Heckman Office
Washington, D.C.

10:00 A. M.
March 14, 1975

Attendees:

Gary H. Baise - Ruckelshause, Beverage & Fairbanks, Faragut Sq., S., Washington, DC
Herb Carr - Tenneco Chemicals, P.O. Box 2, Turner Pl., Piscataway, N.J. 08854
Gary W. Daigre - Dow Chemical Co., P.O. Box 150, Plaquemine, La. 70005
Joseph E. Hadley - Keller & Heckman, 1150 17th St., N.W., Washington, D.C. 20036
W. C. Holbrook, B.F. Goodrich Chemical Co., 6100 Oak Tree Blvd, Cleveland, Ohio 44131
R. W. Laundrie, General Tire & Rubber, One General St., Akron, Ohio 44329
J. R. Lawrence, SPI, 250 Park Avenue, New York, N.Y. 10017
Cecil Loechelt, Ethyl Corp., Ethyl Tower, P.O. Box 241, Baton Rouge, La. 70801
W. W. Madden, Firestone Plastics, P.O. Box 699, Pottstown, Pa. 19464
James Mullins, Shell Chemical Co., P.O. Box 2463, Houston, Texas 77001
D. A. Scholes, Hooker Chemicals, Buffalo Ave., Niagara Falls, N.Y. 14302
R. N. Wheeler Union Carbide Corp., 437 MacCorkle Ave., S. Charleston, W.Va. 25303

- 1 - Mr. Laundrie stated the purpose of the meeting was to prepare a technical critique of the draft of EPA's Standard Support - Environmental Impact Document that was distributed from Durham on March 6.
- 2 - Mr. Baise indicated that the result of the NAPCTAC meeting to review the Vinyl Chloride Report might be to cause modification of the draft standard on the basis of information that industry might supply. He believes that the Durham Emission Standards and Engineering Division must have all input for such changes by about April 1 if it is to meet its schedule of publishing the Standard by late June.
- 3 - Mr. Baise distributed copies of a report on the Organization and Functions of the National Air Pollution Control Techniques Advisory Committee (copy attached). Based on prior observation of this group in action he identified those individuals who might be most supportive of industry positions and those who might present the strongest challenges to industry positions.
- 4 - The five individuals (Messrs. Baise, Hadley, Holbrook, Madden and Wheeler) who had visited EPA's Durham Engineering Division on March 13 reported that the review of the special problems faced by producers of vinyl dispersion resins was well received. They recommended that a concise definition of dispersion resins, compared with resins prepared by other types of processes, be prepared for inclusion with the report that had been prepared on these products. Mr. Smalley of Tenneco (also with the group in Durham) will prepare

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such a definition for review by Messers. Holbrook, Madden, and Wheeler. Target timing is to get this material to Durham by March 21.

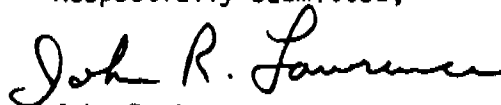
- 5 - Mr. Landrie directed the group's discussion of each section of the Proposed Standard for PVC plants as it appears in Chapter 1 of the EPA report. Committee members volunteered to prepare written critiques of sections of the Standard as follows:

<u>Standard Section</u>	<u>Principal Critiques</u>
A - 4	R. N. Wheeler, Union Carbide with help from Messers. Daigre, Holbrook, and Mullins.
A - 5	R. N. Wheeler (R. Landrie will develop list of "all major pieces of equipment")
A - 7	R. N. Wheeler
A - 8	R. N. Wheeler (make insert after "jet exhausts" of "which contain VC in excess of 10 ppm")
A - 9	J. Barr (working on a critique of control of VC in water emissions on the basis of this matter coming up during Feb. 25 meeting in Durham) Also need to cover the conflict between 400 ppm downstream from stripper and control of VC in process water.
C	C. Loehelt will develop statement covering infeasibility of eliminating "all" relief discharges
E	Messers. W. C. Holbrook and R. N. Wheeler. H. Carr will cover limitation on use of carbon absorption.
F	D. Scholes will prepare a special statement on bulk resins. Also, Ethyl and Hooker representatives will prepare an alternative statement on the possibility of averaging high and low emissions from different kinds of resins to give an overall average of 400 ppm downstream from stripper.

Note: Although certain individuals volunteered to develop draft statements on itmes as noted above, all were urged to be prepared to submit additional comments on points they feel should be covered.

- 6 - Representatives from companies producing monomer volunteered to prepare statements on this portion of the proposed standard that may cover concepts not applicable to the PVC plants.
- 7 - Mr. Landrie called for general comments on other chapters in the EPA report. There are apparently numerous comments and corrections that should be made throughout the entire report. It was agreed that everyone would come prepared on March 19 to pass these comments along for inclusion in a copy of the report that might be passed along to EPA's Engineering Division staff.
- 8 - In discussing the format of the presentation to NAPCTAC the group agreed that we would plan to consolidate industry's comments under major headings that would be presented by a limited number of industry spokesmen. The following are the categories suggested for consideration:
 - 1) Preamble statement
 - 2) Fugitive emissions
 - 3) Control techniques
 - a - general
 - b - specific
 - incineration (Dow will prepare statement)
 - absorption (Dr. Miller of Stauffer will prepare statement)
 - adsorption (Tenneco will prepare statement)
 - 4) Emissions down stream from stripper
 - 5) Dispersion resins
 - 6) Emergency venting
 - 7) Emissions from monomer plants
- 9 - The meeting adjourned at 3:00 P.M. with the group agreeing to reconvene on March 19 at the Mayflower Hotel as scheduled. The March 19 meeting will be a working session to prepare a more specific presentation recommendation to pass on to the VCM and PVC Producers Group's Steering Committee meeting on March 20.

Respectfully submitted,



John R. Lawrence
Technical Director

JRL:jo
Attachment