



CHEMICAL MANUFACTURERS ASSOCIATION

DEC 11 1990

December 6, 1990

TO: Vinylidene Chloride Panel

The legal firm of Paul, Hastings, Janofsky, & Walker sent me the new air toxic emissions limits for the state of South Carolina. Also enclosed is South Carolina's "Proposed Regulation" list, which is a result of the Clean Air Act Amendments. The proposed list includes 101 chemical substances, including vinylidene chloride.

In addition, I talked to Lance Wallace of EPA. He will be sending me more information on his study. I will forward this additional data to you when I receive it.

If you have any questions, please call me at 202/887-1189.

Sincerely,

A handwritten signature in cursive script that reads "Jonathon T. Busch".

Jonathon T. Busch
Manager, Vinylidene Chloride Panel

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202-457-9423

OUR FILE NO.

MEMORANDUM TO CMA VINYLIDENE CHLORIDE PANEL

Re: South Carolina Toxic Air
Pollutants Regulation

Attached is an air toxics regulation that sets emission limits for facilities in South Carolina with respect to specified air toxics. This regulation has been approved by the Board of the South Carolina Department of Health and Environmental Control and submitted to the South Carolina legislature for its review. It lists approximately 159 substances that were drawn from lists used by four or five other states and from EPA proposals.

Also attached is a second list, entitled "Proposed Regulation," which would add to the South Carolina list of air toxics 101 additional substances, including vinylidene chloride, that are listed in the Clean Air Act Amendments but are not on South Carolina's initial list. It has not yet been approved by the Board nor submitted to the legislature.

The lists divide substances based on chronic exposures as follows:

Category I: Low Toxicity - Those pollutants which cause remedial reversible changes which disappear after exposure ends. Category II: Moderate Toxicity - Those pollutants which may cause chronic reversible or irreversible changes that are not severe enough to result in death or permanent injury. Category III:

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High Toxicity - Those pollutants which may cause chronic effects that result in death or permanent injury after very short exposure to small quantities.

We have been told by personnel from the South Carolina Bureau of Air Quality Control that substances were classified into categories of toxicity based on information obtained primarily from Irving Sax's Dangerous Properties of Industrial Chemicals. For example, a listed substance would be classified in Category III if Sax said IARC found the substance to be a carcinogen.

Vinylidene chloride is listed on the proposed second list in Category III: High Toxicity. A maximum allowable concentration of 99.00 $\mu\text{g}/\text{m}^3$ is proposed for vinylidene chloride.

These regulations currently apply only to emissions from industrial facilities. We are not aware of whether any member company or member's customers would be affected by the regulation because of plants in South Carolina. The Panel may want to consider commenting on the proposed listing of vinylidene chloride, if any member is likely to be affected, assuming the proposed findings are controversial.



R. Bruce Dickson
Lorie J. Schmidt-Praul

Attachment

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THIS REGULATION APPROVED BY THE BOARD OF THE SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL ON AUGUST 9, 1990

61-62.5 Standard 8. Toxic Air Pollutants.

I. GENERAL APPLICABILITY.

This Standard is applicable to sources of toxic air pollutants as provided below. This Standard does not apply to fuel burning sources which burn only virgin fuel or specification used oil. The terms in this Standard are used as defined in South Carolina Air Pollution Control Regulations and Standards Regulation 62.1, Section I, "Definitions".

A. EXISTING SOURCES: Any person with an existing source of any toxic air pollutant shall be required to show compliance with this standard not later than two years after the effective date of this standard. These sources must provide the Department with the name and Chemical Abstract Service(CAS) number of the chemical, stack parameters, and emission rate data. If potential emissions of any single toxic air pollutant are 1000 lbs/month or greater an operating permit will be required. An operating permit may or may not be required for sources with emissions less than 1000 lbs/month. This determination will take into consideration, but not be limited to, the nature and amount of the pollutants, location, proximity to commercial establishments and residences.

Any person holding an operating permit prior to the effective date of this standard shall be required to submit toxic air pollutant data prior to renewal of the operating permit, but not later than two years after the effective date of this standard. Toxic air pollutant data must be submitted for all sources at the facility, including sources not previously subject to permit requirements.

B. NEW SOURCES: Any person who constructs, alters, or adds to a source of toxic air pollutants after the effective date of this standard, shall comply with this standard. These sources must provide the Department with the name and Chemical Abstract Service (CAS) number of the chemical, stack parameters, and emission rate data. If potential emissions of any single toxic air pollutant are 1000 lbs/month or greater a construction permit will be required. A permit may or may not be required for sources with emissions less than 1000 lbs/month; however, all sources are required to provide data on toxic emissions. This determination will take into consideration, but will not be limited to, the nature and amount of the pollutants, location, proximity to residences and commercial establishments, etc.

C. This standard will not supersede any requirements imposed by Federal National Emission Standards for Hazardous Air Pollutants nor any special permit conditions, unless this standard would impose a more restrictive emission limit.

D. Additions and deletions to the list of Toxic Air Pollutants may be made following normal administrative procedures

II. TOXIC AIR EMISSIONS.

A. Toxic emissions data provided by the source will be modeled using the latest versions of United States Environmental Protection agency air dispersion models to determine the concentration of the toxic air pollutant in the ambient air at or beyond the plant property line, using 24-hour averaging.

B. The allowable ambient air concentration of a toxic air pollutant at the plant property line as determined by modeling under Part A shall be limited to the value listed in the following table. The pollutants are divided into three categories based on chronic exposure as follows: Category I: Low Toxicity - Those pollutants which cause readily reversible changes which disappear after exposure ends. Category II: Moderate Toxicity - Those pollutants which may cause chronic reversible or irreversible changes that are not severe enough to result in death or permanent injury. Category III: High Toxicity - Those pollutants which may cause chronic effects that result in death or permanent injury after very short exposure to small quantities.

CHEMICAL NAME	CAS NO.	MAXIMUM ALLOWABLE CONCENTRATION (ug/m3)*
CATEGORY I: LOW TOXICITY		
Acetic Anhydride	108247	500.00
Acetonitrile	75058	1750.00
Ammonium Chloride	12125029	250.00
Chlorine	7782505	75.00
2-Chloroacetophenone	532274	7.50
Cyanamide	420042	50.00
Cyanic Acid	420053	500.00
Cyanide	57125	125.00
Cyanoacetamide	107915	125.00
Cyanogen	460195	500.00
Ethanolamine	141435	200.00
Formamide	75127	750.00
Formic Acid	64186	225.00
Furfural	98011	200.00
Hydrochloric Acid	7647010	175.00
Hydrogen Cyanide	74908	250.00
Isopropylamine	75310	300.00
Methyl Ethyl Ketone(2-Butone)	78933	14750.00
Methyl Methacrylate	80626	10250.00
Methylamine	74895	300.00
Methylene Chloride	75092	8750.00
Naphthalene	91203	1250.00
Nitric Acid	7697372	125.00
1-Nitropropane	108032	2250.00
Phosphoric Acid	7664382	25.00
Trichloroethylene	79016	6750.00

CATEGORY II: MODERATE TOXICITY

Acetaldehyde	75070	1800.00
Acrylamide	79061	0.30
Aldicarb	116063	6.00
Allyl Chloride	107051	30.00
Butanethiol	109795	15.00
Cresol	1319773	220.00
p-Dichlorobenzene	106467	4500.00
Diisodecyl Phthalate	2671400	50.00
m-Dinitrobenzene	99650	10.00
Dioctyl Phthalate	117840	50.00
Ethanethiol	75081	10.00
Ethyl Benzene	100414	4350.00
Ethylene Dibromide	106934	770.00
Furfuryl Alcohol	98000	400.00
Hexachlorocyclohexane (multiple isomers)	608731	5.00
Hydrogen Sulfide	7783064	140.00
Hydroquinone	123319	20.00
Isophorone	78591	250.00
Malathion	121755	100.00
Maleic Anhydride	108316	10.00
Methyl Mercaptan	74931	10.00
Methylene Biphenyl Isocyanate	101688	2.00
Methyl-Isobutyl Ketone	108101	2050.00
Nitroglycerin	55630	5.00
Oxalic Acid	144627	10.00
Pentachlorophenol	87865	5.00
Phenol	108952	190.00
p-Phenylenediamine	106503	1.00
Phenylhydrazine	100630	200.00
Phosgene (Carbonyl Chloride)	75445	4.00
Picric Acid	88891	1.00
Pyrethrum	8003347	50.00
Rotenone	83794	50.00
Sodium Hydroxide	1310732	20.00
Sulfuric Acid	7664939	10.00
Tetrachloroethylene (Perchloroethylene)	127184	3350.00
Toluene Diisocyanate	584840	0.40
Toluene-2, 4-diisocyanate	584849	0.40
1,2,4-Trichlorobenzene	120821	400.00
Urethane (Carbamic Acid Ethyl Ester)	51796	5000.00
Vinyl Fluoride	75025	19.00
Xylene	1330207	4350.00
m-Xylene	108383	4350.00
o-Xylene	95476	4350.00
p-Xylene	106423	4350.00

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Methyl Bromide	74839	100.00
Methyl Hydrazine	60344	1.75
4,4-Methylenedianiline	101779	4.00
Mineral Oil Mist (mixture)	)	25.00
Mirex	2385855	4500.00
a-Naphthylamine	134327	0.00
b-Naphthylamine	91598	0.00
Nickel Carbonyl	13463393	1.75
Nickel Oxide	1313991	5.00
Nickel Sulfate	7786814	5.00
Nickel	7440020	0.50
p-Nitroaniline	100016	15.00
Nitrobenzene	98953	25.00
4-Nitrobiphenyl	92933	0.00
Nitrogen Mustard	51752	0.00
p-Nitrophenol	100027	0.00
Nitrosodimethylamine	62759	0.00
Nitrosomorpholine	59892	5000.00
p-Nitrosophenol	104916	0.00
p-Nitrotoluene	99990	5.50
Octachloronaphthalene	2234131	0.50
Paraquat	1910425	0.50
Parathion	56382	0.50
Polychlorinated Biphenyls (PCB) (multiple compounds)	)	2.50
b-Propiolactone	57578	7.50
1,2 Propylene Oxide	75569	250.00
Pyrethrin I	121211	25.00
Pyrethrin II	121299	25.00
Quinone	106514	2.00
Tetrachlorinated Dibenzo-p- dioxins	1746016	0.00
1,1,2,2-Tetrachloroethane (Acetylene tetrachloride)	79345	35.00
Toxaphene	8001352	2.50
Vinyl Bromide	593602	100.00
Vinyl Chloride	75014	50.00
Xylidine	1300738	50.00

* For the purpose of this standard, these values shall be rounded to the nearest hundredth of a ug/m3. For example, a test or modeled value of 0.005 through 0.01 would be rounded to 0.01 but values less than 0.005 would be rounded to 0.00.

) No CAS number.

III. CONTROLS.

If modeling indicates that the maximum allowable concentration is exceeded, the Department may allow approved, site specific modeling by the source on a case-by-case basis. If this approach does not demonstrate that the public health will be adequately protected, the source will be required to reduce emissions by implementing controls, altering the process, or limiting production.

IV. SOURCE TEST REQUIREMENTS.

The owner or operator of all sources of toxic air pollutants shall conduct such tests as required by the Department to verify toxic air pollutant emission rates. The test methods and procedures used shall be approved by the Department prior to testing.

V. RECORDKEEPING.

A. Copies of all records and reports required under this Standard shall be available for inspection by the Department during normal business hours and copies shall be provided to the Department within ten working days of receipt of a written request by the Department.

B. Copies all records and reports required under this Standard shall be maintained by the owner/operator for 3 years after the date on which the record was made or the report submitted.