



INTERNAL CORRESPONDENCE

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Date December 13, 1979

Originating Dept.

Subject

C: F. D. Bess
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Gentlemen:

During the discussion on the Ethylbenzene BID document by the NAPCTAC Committee in Raleigh, N.C. on December 12, 1979, I heard Mr. Carl Beard comment that he had a problem with the existing Vinyl Chloride Standard. Mr. Don Goodwin, Chairman of the Committee, indicated he wanted to discuss the V.C. Standard with Carl because he felt EPA would have to review the standard as a result of the EDF litigation.

At one of the "breaks" I asked Carl what he was concerned about. He replied that the standard, as presently written, would allow a plant to emit a large amount of V.C. to be emitted (with no time limit), and that it doesn't have to be reported to regulatory agencies for two months. He specifically referred to the approximately 50M pound loss at Location 514 and the relatively recent loss at the Technical Center. Carl indicated the standard should require controls that would prohibit the discharge of V.C., especially safety valves and rupture disks, directly to the atmosphere. The meeting was called-to-order again, so I didn't get a chance to continue the discussion.

This information may be useful to you in your future thoughts and actions on V.C. controls in West Virginia. I'm sure he would be willing to discuss it in more detail, but I don't know how rationally.

Very truly yours,

R. L. Foster

RLF/db

P.S. Carl also "made-it-known" that he purposely let the Technical Center emission slip-through to minimize problems for us.

UCC 104553