

October 8, 1984

TO: P. M. King
R. J. Samelson ✓

RE: Draft Vinyl Chloride Regulations

On September 25, 1984, I received a call from W. C. Holbrook at B. F. Goodrich. He has been leading the Manufacturing Practices Committee of the Vinyl Institute in that group's effort to review and comment upon EPA's promulgation of a new vinyl chloride NESHAP standard.

He was calling to solicit additional PPG input and assistance on the regulations. He is especially concerned about the change in the definition of "EDC Purification" which would not include all EDC intermediate storage tanks and which would limit emissions to less than 10 ppm. This is a problem for B. F. Goodrich at their plant and they estimate that it would cost \$2 million to comply with this revised standard. In addition, B. F. Goodrich thinks it is unnecessary and will not contribute to the air quality at the plant.

He assumes that PPG has the same problem. Accordingly, he, on behalf of the Vinyl Institute, would like some data from PPG in order to talk to EPA about the following:

1. Number of tanks.
2. The cost of control.
3. The effectiveness of control.

The Manufacturing Practices Committee is planning to get together on October 10 in Phoenix. This is in order to match up to a Vinyl Chloride Safety Association meeting on October 11 and 12. The agenda for the Manufacturing Practices Committee will be as follows:

1. EDC Tanks
2. Leak detection programs
3. Incinerator bypassing.

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Environmental Affairs

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I told W. C. that I would talk to people at Lake Charles and get back to him with a name and an opinion on whether we would be able to put this information together. As I have said before, I think it is critical that we participate in this effort and I think it is important that we send someone from Lake Charles to Phoenix to attend this "shirt sleeve" meeting. If you need any additional information on the meeting, I suggest you give W. C. Holbrook a call.

David Cannon, Jr.

David C. Cannon, Jr.

DCC/eb

cc: J. E. Wyche
K. Komoroski
W. B. Graybill

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