

MEMORANDUM OF CONVERSATION

Telephone Conversation: J. R. Soice to John Benedict (WVAPCC)
October 2, 1981, 9:55 a.m.

1. Called for Bob Weser, but Bob was out of the office. Call was transferred to John Benedict.
2. I told John that I was calling to report a release of vinyl chloride to the atmosphere. The release occurred at 2:10 a.m. on October 2, 1981, and resulted in the loss of 33 pounds of vinyl chloride. The loss was caused by an operational problem.
3. John asked what form the material was in. I told John that vinyl chloride is a gas at STP. He asked about a "powdered form." I told him that he was referring to polyvinyl chloride.
4. John asked about weather conditions. I told him that the wind was from the west at 6 to 9 miles per hour.
5. I told John that the loss had been reported to the EPA. The WVAPCC will receive a copy of our written report to the EPA.

J. R. Soice

JRS:co

October 2, 1981

cc: R. N. Bates
B. N. Gliatta
R. T. Kramer/R. L. Foster
R. R. Rankin
J. L. Worstell
EPD Staff
Shift Superintendents
Utility Foremen

UCC 102357

MEMORANDUM OF CONVERSATION

Telephone Conversation: J. R. Soice to
Andrew Kolarsky (EPA Wheeling)
October 2, 1981, 11:15 a.m.

1. I called Kolarsky to tell him that a report which we were required to submit under Section 61.65(a) of the vinyl chloride NESHAP would be late. I explained that we had a safety relief valve discharge on September 22, which meant that our ten-day reporting period apparently ended today. However, another discharge occurred early this morning from the same system, and we were holding up the report from the September 22 discharge to include information on the October 2 discharge. I told him that we would have the report in the mail on Monday (October 5).
2. Kolarsky agreed with this timetable, but was somewhat curious about the discharges. I explained that we had reported both occurrences to the EPA Hotline in Philadelphia, and he dropped the matter.
3. I asked Kolarsky if the ten days referred to in the standard were "working days" or "calendar days." He was unsure, but will check.

Same Day, 1:15 p.m.

4. Kolarsky said that the ten days referred to in the standard (61.65(a)) are calendar days, and technically our report was due today (October 2).
5. Kolarsky said that he had talked to "the Enforcement Branch" and that in the future there should be no exceptions to submitting the required report in the specified time. By the words he used, I get the feeling that he had been taken to task for granting us an extension.
6. I explained to Kolarsky that it took some time to assemble the data required for the EPA report, especially the plan to prevent future discharges. Also, in a large corporation such as Union Carbide, several levels of review were required before a report could be released.

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7. Kolarsky seemed to sympathize with our position, especially when I mentioned our law department review. He said that we should submit as much information as possible by the ten-day limit and then submit a supplemental report if necessary.

J. R. Soice

JRS:co

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