



TO W. J. Peard/K. S. Komoroski DATE October 15, 1984

FROM B. D. Reynolds *BA* SUBJECT Vinyl Institute - Manufacturing Practices Committee

The Manufacturing Practices Committee of the Vinyl Institute met on Wednesday, October 10 at the Clarion Inn in Scottsdale, Arizona. W. C. Holbrook of B. F. Goodrich, Chairman of the Committee, led the discussion. Companies represented were Tenneco, Vista, B. F. Goodrich, Dow, Air-Products, Borden, CertainTeed, Occidental, and PPG. R. Gottesman and M. Scheck represented the Vinyl Institute. A copy of the agenda is attached. A copy of EPA's reply to comments received at the August 30 NAPCTAC meeting is also attached.

There will be a meeting with EPA on October 30 in Durham, North Carolina to allow the Vinyl Institute to present additional information on the following three areas of the proposed modifications.

1. EDC Tanks - (B. Oubre - Dow, Subcommittee Chairman)

Dow, PPG, and BFG were the only companies out of those represented at the meeting which had a problem with this change in the regulation. The VI opposes the change in the definition as it provides no environmental benefit. The subcommittee plans to present examples of the cost to control EDC tank vents. BFG has 10 tanks with VCM emissions estimated at 0.0067 T/yr. Some are open top tanks with a water layer over the EDC. The estimated cost to close the tanks and route the vents to the incinerator is \$2.8 MM or \$418 MM/ton VCM controlled. Dow has similar problems with their wet oxy crude tanks. Their tanks are rated for less than 1 psig. They would probably educt their vents into their vent header if required to do so. I told them we had only preliminary data at this time and no cost estimate, but felt we'd be in the same ballpark in emissions and cost. They would like to be able to include PPG's estimate in the presentation to EPA on October 30 and would like to have this information by October 20 (Submit to M. Scheck - Vinyl Institute). The companies will not be identified in the discussions with EPA.

2. Leak Detection - (B. Barton - Borden, Subcommittee Chairman)

The committee felt that since most companies were working under 'approved' leak detection programs, the existing programs should be accepted under an equivalency clause. The argument is that fixed monitoring plus the existing leak patrol is better than the proposed regulations. They plan to argue against the 2% leakage on valves, emphasizing that every valve/flange is an enormous undertaking. It was also pointed out that record keeping should be limited to leaks/repairs rather than generating large volumes of paper just to check off points on a list. The committee plans to propose a list of criteria for leak detection programs to EPA.

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3. Incinerator Bypassing - (J. Ledvina - Vista, Subcommittee Chairman)

The committee favors proposing a performance standard of an on-stream factor for VCM vents of 99%. Data from 10 different plants indicated the average amount of VCM released in a bypass is 30 lbs. The median '%-bypassed' was 0.2. The concern was that 10 ppm over a three-hour period was not achievable.

The VI does not intend for the October 30 meeting to be a critique of the VHAP regulations, but rather an emphasis on the fact that existing programs are working. PPG should be represented at this meeting.

BDR/bjm

Attachments

cc: R. J. Samelson - G.O. 36 B1
S. L. White

agenda

\$1

MANUFACTURING PRACTICES COMMITTEE

The Clarendon
7401 North McDowell Road
Scottsdale, Arizona

Wednesday
October 10, 1984
9 am

1. Preparation of additional technical information for EPA regarding modification to the VCM standard:

- a. EDC Tanks: Members should come prepared with a list of tanks and cost for control of VCM emissions to 10 ppm should EPA change the definition of Part 61.61 (O) as proposed thereby requiring control of emissions from crude and finished EDC storage tanks and by-product storage tanks.
- b. Leak Detection: Members should come prepared to discuss the specific differences between their existing leak detection and elimination plans versus Subpart V. Mr. Holbrook expects this discussion to take quite a bit of time as we will be preparing what he envisions to be minimum requirements to present to EPA.
- c. Incinerator Bypassing: Members should come prepared to discuss their prior two years' history of incinerator bypassing including causes therefore, number of times bypassed, duration of each bypass, VCM emissions associated with each bypass, etc.

2. Feedback from Dr. Gottesman regarding Committee's planned activities as presented at the Annual VI Executive Board meeting.

3. Other business as necessary

Antitrust Reminder

Group activities of competitors are inherently suspect under the antitrust laws. Many agreements among competitors, however, are both legal and beneficial to the industry. The best vehicle for enjoying the benefits of permitted agreements among competitors while avoiding the pitfalls of illegal agreements is by belonging to a trade association like SPI which takes its obligations in this regard very seriously.

All SPI staff members are well versed in antitrust matters and the association relies heavily on their judgment to see that topics which may give an appearance of an agreement that would violate the antitrust laws are not discussed at SPI meetings. The fact that an SPI staff member is present at a meeting, however, should not invite probing to determine how far a discussion can proceed before it becomes apparent that it is improper and is cut off. It is the responsibility of each member in the first instance to avoid raising improper subjects for discussion. This reminder has been prepared to assure that participants in SPI meetings are aware of this obligation.

The Dos and Don'ts presented below highlight only the most basic antitrust principles. Each participant in an SPI meeting should be thoroughly familiar with the SPI Bulletin, "The Antitrust Laws and You — A Guide and Introduction to an Understanding of the Federal Antitrust Laws," and should consult counsel in all cases involving specific situations, interpretations, or advice.

DON'T

1. Do not, in fact or appearance, discuss or exchange information regarding:
 - a. Individual company prices, price changes, price differentials, mark-ups, discounts, allowances, credit terms, etc. or data that bear on price, e.g., costs, production, capacity, inventories, sales, etc.
 - b. Industry pricing policies, price levels, price changes, differentials, etc.
 - c. Changes in industry production, capacity or inventories.
 - d. Bids on contracts for particular products; procedures for responding to bid invitations.
 - e. Plans of individual companies concerning the design, production, distribution or marketing of particular products, including proposed territories or customers.
 - f. Matters relating to actual or potential individual suppliers that might have the effect of excluding them from any market or of influencing the business conduct of firms toward such suppliers or customers.
2. Do not discuss or exchange information regarding the above matters during social gatherings incidental to SPI-sponsored meetings, even in jest.
3. Do not meet without SPI staff or counsel present.

DO

1. Adhere to prepared agendas for all SPI meetings and object any time meeting minutes do not accurately reflect the matters which transpired.
2. Understand the purposes and authority of each SPI group in which you participate.
3. Consult with the SPI General Counsel and your company counsel on all antitrust questions relating to SPI meetings.
4. Protest against any discussions or meeting activities which appear to violate the antitrust laws; disassociate yourself from any such discussions or activities and leave any meeting in which they continue.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

SEP 28 1984

RECEIVED

OCT 9 1984

Mr. W. C. Holbrook
BF Goodrich
6100 Oak Tree Boulevard
Cleveland, Ohio 44131

Dear W.C.:

I would like to take this opportunity to thank you for your recent comments on behalf of the Vinyl Institute and BF Goodrich regarding the recommended revisions to the national emission standard for vinyl chloride. We carefully reviewed your comments and prepared a response addressing all of the concerns raised at the August 30 meeting of the National Air Pollution Control Techniques Advisory Committee (NAPCTAC). A memorandum outlining our position and the anticipated changes based on the recommendations is attached for your information.

We look forward to a continuing dialogue and are prepared to answer any questions about the attached materials during our tentative meeting with Vinyl Institute representatives. Otherwise, if we can be of assistance to you, please call Mr. Fred Dimmick at (919) 541-5578 or me at (919) 541-5571.

Sincerely,

Jack R. Farmer
Director
Emission Standards and
Engineering Division

cc: John T. Barr, Air Products
and Chemicals, Inc.
James W. Kachtick, Tenneco
Polymers, Inc.
Joseph Ledvina, Vista Chemical
Company
NAPCTAC Members

Oct 30th in Durham 9AM.
VI meet @ Governor's
In on 10/29. Evening
prior to EPA Mtg.

RADIAN

CORPORATION

MEMORANDUM

DATE: September 5, 1984

TO: Fred Dimmick, Standards Development Branch

FROM: Karen Fidler, Radian

SUBJECT: Vinyl Chloride Review - Response to Comments Made at NAPCTAC

PURPOSE

On August 31, 1984, a meeting was held between representatives of the Chemicals and Petroleum Branch, Standards Development Branch and Radian to discuss the comments made during the August 30, 1984, National Air Pollution Control Techniques Advisory Committee (NAPCTAC) meeting and to concur on a position to be taken in responding to these comments. This memorandum summarizes the results of the meeting.

OUTLINE OF RESPONSE

Comment: The recommended revision to the definition of "in vinyl chloride service" is too restrictive and unnecessary.

Response: The intent of the revision was to place the burden of proving whether equipment is in vinyl chloride service on plant personnel and not on enforcement personnel. This position is reasonable and consistent with the recently promulgated standard for benzene equipment leaks. However, the revision was not intended to include equipment not originally intended to be included in the current definition. We will review the language in the revised definition to assess whether it is restrictive and, if needed, we will revise the definition.

Comment: No justification was provided for the revision to the definition of "ethylene dichloride purification" and particularly for inclusion of storage tanks in the definition.

Response: The revision to the definition was not intended to broaden the existing definition but was intended to clarify the definition because certain plants had misinterpreted what equipment was covered. The existing definition was intended to include inprocess storage tanks (where vinyl chloride may be present) and not final product storage tanks (where vinyl chloride is not expected to be present). The reason for the revision will be added to the preamble. (Meanwhile, the BF Goodrich representative indicated that he would submit information on the vinyl chloride content of liquid ethylene dichloride and vapor space in storage tanks that might, in his opinion, be regulated by the revised definition as written. The purpose of this submittal is to help us clarify which tanks in fact we intended to be covered by the standard.)

Borden tied into recovery system for EDC recovery

VISTA - tied into "recovery device" - then to inc.

Progress Center/3200 E. Chapel Hill Rd./Nelson Hwy./P.O. Box 13000/Research Triangle Park, N.C. 27709/(919)541-9100

SL 073459

Comment: The revision to the definition of "vinyl chloride purification" should not include the phrase "prior to sale or transfer off-site" since some facilities use the vinyl chloride product on-site to produce PVC.

Response: The phrase "prior to sale or transfer off-site" will be deleted from the definition.

Comment: Inclusion of "other pressure control systems" in the revision to the definition of "relief valve" could be misinterpreted and misapplied to systems such as emergency shortstop systems and refrigerated water systems.

Need to emphasize "pressure control valves" not to be included.

Response: The revised definition is not intended to include emergency shortstop or refrigerated water systems. The proposed revision will be reviewed and clarified to reflect the intended definition and to avoid misinterpretation.

Comment: Changes to the wording of the 10 ppm requirements should be clarified to make clear that combining of streams of less than 10 ppm vinyl chloride with streams of greater than 10 ppm prior to control is not prohibited.

Response: The standard intends that vinyl chloride in streams be reduced to less than 10 ppm by the use of an emission reduction control technique and not by the use of dilution. The changes to the 10 ppm requirements in the preamble and regulation will be reviewed and clarified as needed. *VISTA concerned about combined streams to emission control device being classified as multiple releases, i.e. from each vessel going to control device*

Comment: Revisions to §61.64(a)(1) appear in two places and are not consistent.

Response: This inconsistency will be changed appropriately.

Comment: The compliance method for in-reactor-stripping operations does not allow for averaging of reactor opening losses and stripping levels as allowed in the existing standard for nonreactor stripping operations. Averaging is necessary to achieve compliance.

Response: The compliance method for in-reactor-stripping operations does in fact allow averaging of reactor opening loss over the number of batches between openings (as is allowed in the existing standard for other reactors not used as strippers). Ways of modifying the method to allow averaging of stripping levels across in-reactor-strippers producing the same resin type are being investigated. The method to provide for averaging of stripping levels will likely be complex.

Comment: The revision to the relief valve discharge standard in §61.65(a) should be changed to: (1) specify that the requirements apply only to reactors "in vinyl chloride service"; (2) apply a single limit to

all reactors in a plant rather than by resin type; and (3) provide a rounding procedure since there is no such thing as a fractional discharge.

Response: The revised relief valve discharge standard will be changed to specify that only reactors in vinyl chloride service are covered. The recommended numerical limits were determined by evaluating performance data on the basis of separate resin types and do not take into account any rounding of fractional discharges. The basis on which the recommended limits were determined is still considered appropriate; thus, no changes will be made to the format of the limits in response to these comments. X

Comment: Additional language should be added to §61.65(b)(7) to allow the destruction of unused portions of samples rather than require that they be returned to the vinyl chloride process.

Response: Additional language will be added to §61.65(b)(7).

Comment: Plant operators should be given the option of complying with the leak detection and elimination programs already in place or with the proposed requirements in Subpart V.

Response: The EPA believes it is appropriate to specify a routine leak detection and repair program for valves to be adopted by all plants with components in vinyl chloride service. As discussed in the preamble, this can now be done because experience in developing programs for other standards has occurred since the vinyl chloride standard was established. Plants who have programs in place that are equivalent or more stringent than the new requirements will be in compliance with the proposed revisions. Only plants with less stringent leak detection and repair programs will be required to alter their current procedures. This is consistent with the intent of the current standard which is to ensure that an effective leak detection and repair program is practiced by all plants.

During the NAPCTAC meeting, the EPA responded to this comment by again asking if specific companies had programs in place that they considered to be better than the recommended program. Based on input by company representatives on their particular programs and the ensuing discussion, the EPA concluded that the recommended requirements for leak detection and repair are appropriate and are sufficiently flexible to allow plants with effective, existing programs to continue their existing program. *need language!*

Comment: In §61.67(h)(3), in reference to taking samples to determine that equipment is not in vinyl chloride service, the phrase "or the gas being combusted in the flare" seems unnecessary.

Response: The phrase "or the gas being combusted in the flare" is unnecessary and will be deleted.

Comment: As written, the revision to the reporting requirements in §61.70(a) specifies the dates for submitting semiannual and quarterly reports despite the fact that some plants are currently on different reporting schedules based on their original compliance dates. The proposed reporting requirements should include provision for continuation of these alternate reporting schedules.

Response: The revisions to §61.70(a) will include provision for plants with different reporting schedules to continue their current schedule.

Comment: Definitions for "exhaust gas", "leak" and "relief discharge" should be added to the regulation.

Response: Functional definitions for "exhaust gas", "leak" and "relief discharge" are being considered for inclusion in the regulation.

Comment: A numerical standard for incinerator emissions based on annual on-stream time for the incineration system is recommended.

Response: The current 10 ppm standard with a 3-hour averaging period is adequate to allow for brief incinerator bypasses due to malfunction. Based on the information received during the review study, we believe that a 10 ppm standard based on a 3-hour averaging period is achievable. Although we do not anticipate changing the requirements for add-on control devices, we are willing to evaluate any information on continuous performance of incinerators or other add-on control devices to assess whether the current requirements warrant changing.

Comment: The requirement that resin slurry samples be analyzed within 24 hours should be modified to allow analysis within 120 hours (5 days) based on a study that showed no significant statistical difference in vinyl chloride content between samples analyzed with 24 hours and within 120 hours.

Response: The recommended modification will be considered after reviewing the referenced study. (The Vista Chemical Company representative agreed to supply a copy of the slurry sampling study.)

Comment: Relief valve discharges due to so-called "acts of God" such as sabotage, tornados, etc. should be exempted when determining compliance with the recommended numerical limits.

Response: Such an exemption is not appropriate in the regulation. The recommended numerical limits were determined on a basis that includes the possibility of these types of discharges. If unusual situations occur resulting in relief valve discharges, such discharges should be left to enforcement discretion.

must be
one VI
pieces with
definitions

very
important!

As
Prohibits make this
comment, not VI.
VI should
not to push
further.
Individual
companies can do as they wish.

Comment: A de minimus exemption for small relief valve discharges (<100 lb) should be incorporated in the recommended changes to the relief valve discharge standard.

Response: A de minimus exemption can not be added because we lack a reliable, accurate method for measuring discharge quantities. X

Comment: In lieu of the previously recommended de minimus exemption for relief valve discharges under 100 lbs, it is recommended that all but two "hydroful" discharges per year from reactors be exempted. SP

Response: The recommended numerical limits for relief valve discharges were determined by evaluating performance made up of all types of discharges, including "hydroful" discharges. Exempting hydroful discharges would require reevaluation of performance data and would result in different (lower) numerical limits for non-hydroful discharges. The current basis for determining the numerical limits is considered appropriate and no exemptions will be added. X

Comment: A multiple relief valve discharge incident from a single piece of equipment such as a reactor should be counted as a single relief valve discharge for purposes of determining compliance.

Response: In evaluating performance data to determine the recommended numerical limits, multiple discharges occurring simultaneously from a single piece of equipment were counted as one discharge. To be consistent with the basis of the recommended limits, the preamble and regulation will be clarified to specify that multiple discharge incidents from one piece of equipment can be counted as a single discharge in determining compliance. [Note that multiple discharge incidents from several pieces of equipment were counted separately in determining the recommended numerical limits and thus will be counted separately in determining compliance.]

Comment: As written, it is unclear how the recommended limit for relief valve discharges from EDC/VC plants is to be applied in a multiplant complex. The numerical limit for relief valve discharges from EDC/VC plants should apply to each independent production plant within a complex.

Response: In determining the recommended numerical limit for relief valve discharges from EDC/VC plants, it was recognized that certain plants operate more than one production plant in the same complex. In general, the compliance reports submitted by these multiunit complexes do not provide sufficient information to evaluate performance on a per unit basis. Furthermore, discharges from any equipment that is shared in a multiunit complex, such as storage tanks, are not automatically attributable to one unit. Consequently, the recommended limit was determined on the basis of evaluation of performance on a per complex basis rather than on a per unit basis. For this reason, the recommended limit applies to a complex and not to individual production units within a multiunit complex.