

VINYL INSTITUTE  
HEALTH, SAFETY & ENVIRONMENTAL COMMITTEE

NASHVILLE, TN

January 25, 1989

**ROUGH DRAFT**

Gabe Lefebvre - BFGoodrich  
W. C. Holbrook - BFGoodrich  
Bob Dubre - Dow Chemical

HRS and NCP - combined rule making now.  
HRS is now Appendix "A" to NCP

SPI - Siding, Window, Door group meeting is in Maui!!

Joe Ledvina - Vista  
Jim - caustic, OXY, environmental  
Irv Power - OXY  
John Baur is now consulting in Sao Paulo.

CMA has outside council to work on comments

Thrust is to clean up sites to background levels regardless if a threat to public health exists.

HRS comments little data available from EPA.

On site land fills ?  
Surface impoundments ?

BFG has superfund site on NFL. Dow may have.

Suggest go through (10 pages) scoring sheets (worksheets about 100 pages) for each plant site.

When rule is finalized by February 21. Exposure through data ways of toxic. Air surface water. Ground water on site exposure.

Default values if no data is available on chemicals/quantities are uncertain.

Old sites scored. If  $> 28.5$ , got on list. Sites added to list if  $> 28.5$ , now 700+ on list. Only new sites will be stored from CERCLA list. New mechanisms developed in toxicological field.

- a) Mass transfer breathing zone one meter high for flushing on polluted lake.
- b) Dermal transfer for swimming in water.

Telephone survey 1987 maybe by VERSAR on pits, ponds, lagoons.

Cannot have enough data on sites. Contractors who score sites for EPA may be unaware or may not know to ask which may help lower your score. (rather than use of default values).

CTL018777

Chris: Whole board "blessed" seminar, but not overwhelmingly.

Do one. assess the success of the first.  
Develop attendance cut off: if not enough interest - cancel.  
1st self funded.

Any limitations on non Vinyl Institute plants? VI member  
companies OK. So other non PVC/VCM plants of VI companies could  
come.

\*\*\*Discuss with CAG about Rod and supervisors attending (maint. and  
production). Overnight.

Literature available date -----  
As a pamphlet (cover letter)

Comment: Don't think 1st session will be for first-line supervisors  
since it is first session. Plant management will be conservative and  
wait for evaluation of program.

Biography by February 3, of panel members.

Lead panel member. Present their companies' procedure. Other panel  
members discuss differences.

DOW has made major shift from safety belts to safety harnesses.

Frank - O on literature.

\*\*Call FPG - Clark Graybill

TCLP Update:

1. Supposed to be finalized no earlier than June.  
(200 PPB) (0.2 PPM) Regulatory for VCM. Not 50 PPB as last  
thought.

Waste impoundments - more time but nothing special (ie: same  
rules)

Calculated as conc. of VCM in water going into pond.

Generic dilution attenuation factor of 100  
Health based 2PPB

Surf impound. Put into system for RCRA Part B

Gabe (216)447-7978

BFG went to tanks.

Liner not good enough unless RCRA type liner, which no one likely has.

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VCM standard update:

EPA is supposed to make amendments consistent with VI agreement, but November 28, 1988. "EPS has begun drafting". Peter de LaCruz

Benzene standard rewrite is part of this.

EPA presentation on storm water discharges under NPDES.

SPI committees that don't have Vinyl Institute interests at heart. "OHEIC" committee. Meredith will go to next meeting.

#### SARA

"Bagging" the plant to determine fugitive emissions contractor "team". DuPont described method.

#### Reporting Leaks

Flare-stack (non-vinyl) CS<sub>2</sub>, HS  
State permit: monitored  
Federally permitted - but reported to SARA  
Got attention from EPA

Immediately reported to state agency. Reported to LEPC later  
Others do not report leaks (VCM > 1 lb). NESHAFF reporting.

May 8th and 9th:

Committee meeting (8)  
Board meeting (9)  
Calaway Gardens (Atlanta, GA)  
Annual meeting.

Relief Discharge 61.65A. Don't report to NRC. However, notify CAER, LEPC.

Leaks not reportable because federally permitted under NESHAFFS

5% vinyl reported since not Federally permitted.  
(Not in vinyl chloride service) > 1 PPM.  
Some use 100 lbs. as reporting trigger. BFG considering to report.

#### Item 8

OSHA Performance Award

- to consider contract employees, not construction employees.
- Dow doesn't want this because of considering of who is "employer"
- Keep last year's method (look for change next year)

VI Safety Award

- nomination sent out.

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\*\*\*REVIEW DATA - MARCH 1\*\*\*

Lawsuits: Dow's flare - Dow lost.

Frank - Georgia Gulf

Legislation: Texas: Prohibit sale and manufacturing of plastic 6-pack  
tops.

2nd tier toxic chemicals  
CMA is doing comments

Next meeting: Probably held in conjunction with VCSA meeting  
September 28 and 29.

Lead  
Cadmium  
Concerns in solid waste