

HEALTH, SAFETY AND ENVIRONMENT COMMITTEE

Sheraton
New Orleans Airport
Kenner, Louisiana 70062

Thursday
January 24, 1991
9:00a - 2:00p

Attendees:

Frank Borrelli, Georgia Gulf Corporation
Peter de la Cruz, Keller and Heckman
W. C. Holbrook, BFGoodrich Company
Frank Jeanson, Vista Chemical Company
Jim Kachtick, Occidental Chemical
Joe Ledvina, Vista Chemical Company
C. D. Messelt, Dow Chemical Company
Don Pearson, PPG Industries
Meredith Scheck, Vinyl Institute

I. OPENING OF MEETING/SELF-INTRODUCTIONS

Committee Chairman Frank Borrelli convened the meeting at 9:00 a.m. and asked for a round of self-introductions.

II. UNIT RISK FACTOR

Mr. de la Cruz reviewed the comments filed on behalf of the Vinyl Institute on December 28th with the Louisiana Department of Environmental Quality. Mr. de la Cruz stated that as the comments were not reviewed due to the short time allowed for them to be prepared, the VI comments left open the filing of additional information. Mr. de la Cruz noted that a review of the background documents used by the Louisiana DEQ does not appear to support the unit risk factor and that it is important not only because it is used to derive ambient air standards, but also because the issue of unit risk factors is already surfacing in other states (i.e., Mississippi, California and others).

Mr. Jeanson of Vista reviewed the status of current activity in Mississippi, where a unit risk factor of 4.2×10^{-5} is being used, which translates into 1/2 ppb. Mr. Jeanson noted that the state would not return the plant's permit until the

company has modeled their emissions. Mr. Ledvina stated that Vista has hired Clement Associates, who, as part of their involvement, have completed a review of state use of unit risk factors summarized as follows:

<u>State</u>	<u>Unit Risk</u>
KS	4.1 x 10 ⁻⁶
NJ	4.1
MA	2.6
MI	2.5
NC	2.6
NY	2.5
PA	.16
TX	.1
VT	5.0
CA	8.6
CA (proposed)	78.1
MS	4.2
LA	4.2
DE	4.1

Mr. Ledvina updated the committee on company activity related to the issue.

Mr. Holbrook recommended that a task force of company experts be formed to develop a defensible position for use in Louisiana and elsewhere, that would recommend a "most appropriate" number. Following discussion, the following was agreed to:

Action: Mr. Ledvina agreed to head a task force of company representatives to discuss the issue and develop a plan for the development of an appropriate/defensible unit risk factor. The following companies agreed to designate toxicologists to Mr. Ledvina as soon as possible - Vista, Occidental, Dow and BFGoodrich. Mr. de la Cruz stated that an individual from the Keller and Heckman staff should also be involved. Mr. Ledvina will convene the initial meeting via conference call.

III. SPI v. OSHA UPDATE AND DISCUSSION

Mr. de la Cruz updated the committee on the status of SPI v. OSHA (on the issue of PEL relative to EDC) and noted that the briefing is expected to be completed in early February. Mr. de la Cruz commented that if the VI were to prevail in its arguments that it would have the court overturn a health assessment. In responding to questions of timing, Mr. de la Cruz noted that should any of the litigants seek supreme court review, the ultimate disposition of the issue would be

delayed. Mr. Pearson commented that it is his understanding that the agreement reached with OSHA on the appropriateness of respirators to comply with requirements related to EDC expires at the end of 1992.

Action: Mr. de la Cruz is to re-examine the agreement with OSHA and make recommendations to the committee if and when further action is warranted.

IV. VINYL CHLORIDE MUTUAL AID NETWORK TASK FORCE

Mr. Borrelli and Mrs. Scheck updated the group on the January 9th meeting of the task force at which time the group, in response to a request from the VI Executive Board, discussed a proposed program for the first year of operation. Also discussed was a proposed organizational structure for the group and a list of suggested activities for the second year of operation. Mrs. Scheck noted that the proposed plan with anticipated budget numbers will be reviewed and discussed at the February 27th meeting of the Executive Board, at which time it is expected that the Board will reach agreement on how best to proceed.

Action:

Mrs. Scheck will distribute the proposed plan to members of the HSE committee before the Board meeting when it is distributed to the Board and task force members.

V. TASK FORCE UPDATES

A. Waste Minimization

Mr. Brocka updated the committee on the October 25th task force meeting and action items held to discuss the recycling of initiator containers. Mr. Holbrook suggested that a plan for the recycling of PVC scrap be discussed (the scrap discussed is that generated in the PVC manufacturing and compounding process such as reactor scrapings). Mr. Ledvina commented that the VI Executive Board should discuss the feasibility of establishing a joint venture. Following a lengthy discussion, the following was agreed to:

Action: Committee members will attempt to assess their company's interest as to whether their company would be interested in working mutually on a program to recycle scrap PVC resin generated in either the PVC manufacturing or compounding process. Committee members will inform Mrs. Scheck by the end of February if their company is interested in further discussing this issue

and identify the appropriate contact. Should there be sufficient interest, a meeting to further discuss the issue will be scheduled.

B. Groundwater - Information Sharing

As follow-up to discussions at the previous meeting, Mr. Holbrook thanked committee members for identifying appropriate technical contacts on groundwater remediation issues. He further noted that at this time, he does not foresee any need for VI involvement, but will apprise staff if this assessment should change.

C. Discussion of OSHA - EDC Engineering Controls

Mrs. Scheck noted that since the original survey was carried out to assess interest in a 2-day seminar on engineering controls, both individuals who had volunteered to organize such an activity had been reassigned. Following discussion, it was agreed that what was needed at this point in time was not a "seminar", but a roundtable discussion on the issue and that it would probably involve a total of 12-15 individuals.

Action: Company representatives to give Mrs. Scheck the appropriate contacts as soon as possible. Once the names are provided, a meeting will be scheduled at a Houston/Hobbie airport location. Mr. Pearson agreed to assist in the preparation of an agenda to guide the roundtable discussion.

VI. REGULATORY UPDATES

Mrs. Scheck updated the group on recent regulatory activity, including the December 13th hearing of the California Air Control Board on the listing of vinyl chloride as a toxic air contaminant. The committee noted, as previously discussed, the industry's interest is focused on the regulatory activity that will follow, particularly the unit risk factor issue. Also highlighted was SPI's activity on stormwater run-off and group permits which was detailed in an SPI memo that was distributed.

VII. STAFF REPORT

A. Literature

Mrs. Scheck distributed copies of the input received on the VI technical bulletin on recommended storage procedures.

Action: A draft incorporating the comments will be circulated to the committee by the end of February for further review and comment. It is anticipated that a revised/approved document will be finalized by the end of March.

B. SARA Data

The committee discussed the most recent year (1989) data and its usefulness.

Action: Mr. Kachtick offered to pursue the availability of non-member data through other sources. Mrs. Scheck will follow-up with non-responders.

C. Clean Air Act Implementation

Mrs. Scheck noted that the SPI has formed a special staff task force on the implementation of the Clean Air Act and specifically detailed the state regulatory survey being prepared by Joe Pattok, SPI Director of State Government Affairs.

VIII. NEW BUSINESS

Mr. Holbrook noted that the January 11th Federal Register contained a notice of a January 29-31 meeting of the National Air Pollution Control Techniques Advisory Committee (NAPCTAC) and that the agenda noted that National Emission Standards for Hazardous Air Pollutants (NESHAPS) Based on Maximum Achievable Control Technology (MACT) is to be discussed as will the Hazardous Organic NESHAPS project. Mr. Holbrook suggested VI involvement at this meeting. Mr. Borrelli noted that based on earlier conversations with Mr. Holbrook and Mr. de la Cruz, that a place on the speakers list had been reserved for the VI. Mr. Holbrook presented a draft of comments on issues he believed should be addressed, but noted that he is already appearing on behalf of CMA at the NAPCTAC. Mr. Ledvina volunteered to represent the Vinyl Institute. The balance of the meeting was spent discussing points to be made in a discussion of the EPA's HON Proposal and the present vinyl chloride NESHAP.

Action: Mr. de la Cruz was asked to prepare comments reflecting the discussion at the committee meeting for use by Mr. Ledvina in representing the VI. (Note: The comments prepared by Mr. de la Cruz were presented by Mr. Ledvina during the NAPCTAC meeting and were mailed separately to committee members February 4th.)

IX. ENFORCEMENT UPDATE

The committee had a brief roundtable discussion on recent enforcement activities.

X. NEXT MEETING/ADJOURNMENT

Subject to the call of the chairman, the next scheduled meeting of the committee will be in conjunction with the VI Annual Meeting May 29-31, 1991.

Respectfully submitted,



Meredith N. Scheck