

The Clean Air Act amendments of 1990 direct EPA to establish source categories and subcategories for a list of hazardous air pollutants as specified in section 112 (b) of the amendments. Subsequently EPA must promulgate maximum achievable control technology (MACT) regulations for such categories and subcategories.

The list of hazardous air pollutants specified in section 112(b) includes certain chemicals for which EPA has already promulgated NESHAPS regulations. An example is the NESHAPS for vinyl chloride (VCM) which is applicable to VCM emissions from ethylene dichloride (EDC), VCM, and polyvinyl chloride (PVC) manufacture. Vinyl Institute (VI) member companies are uncertain as to what changes might be forthcoming regarding MACT application to the EDC, VCM, and PVC industry relative to VCM emissions. We are uncertain how the hazardous organic NESHAPS (HON) being considered would apply to VCM emissions from our industry and we are concerned about potential redundancy and duplicity of the HON with the existing VCM NESHAPS. We offer the following comments relative to each specific emission source type:

1. PROCESS VENTS

INDUSTRY HAS OPTED TO CONTROL THE
PROCESS RATHER THAN "END OF PIPE"
CONTROL

Application of the HON process vent 98% control through combustion requirement to our industry could have a significant adverse impact without any environmental benefit.

PVC plants, as allowed by the existing NESHAPS, VCM emissions from resin dryers are controlled by stripping VCM from the PVC resin before drying. This provision was incorporated into the existing VCM NESHAPS due to the technical and economic infeasibility of controlling VCM emissions from the large volume, moisture containing, low VCM containing dryer vent stream and due to the emissions of other pollutants associated with combustion. The PVC industry has utilized and perfected the resin stripping technology over the years since the VCM NESHAPS was first promulgated and today's stripping technology results in VCM emissions control far in excess of that contemplated by the original NESHAPS.

A similar situation exists with regard to PVC reactor opening emissions. The existing VCM emissions limit was established based on the use of reactor steam sweep and/or clean poly technology which reduced the potential of VCM emissions before opening the reactor to the atmosphere. This technology has also been perfected over the years to the point where actual emissions today are significantly less than contemplated by the original NESHAPS.

PVC plants have utilized combustion technology and absorber/stripper technology to control process vents to the 10 ppm level specified in the existing VCM NESHAPS. The HON being considered could be interpreted to not allow use of the absorber/stripper technology. This would result in unproductive expenditures for the PVC industry in as much as VCM emissions are very highly effectively controlled through the use of absorber/stripper technology. Absorber/stripper technology results in the recovery and reuse of VCM and does not produce combustion related emissions.

2. WASTEWATER TREATMENT OPERATIONS

ALREADY RE-1A-5C UNDER VCM

200-
116 117 118
119 120 121

REDUCTION 100% BY STREAMING

(Discussion needs to be developed)

3. STORAGE

(Discussion needs to be developed)

ALREADY EXCEED 95%

4. TRANSFER OPERATIONS

DEFINED

FILLING TANK, RAIL CAR, TRUCK

(Discussion needs to be developed)

5. EQUIPMENT LEAKS

(Discussion needs to be developed)

That concludes our specific comments. The VI requests the EPA to carefully consider the requirements of the existing VCM NESHAPS and the technologies employed by our industry to comply with such throughout the process of developing and promulgating MACT which will apply to our industry. We urge EPA to consider and allow equivalent control technologies and to avoid redundancy and duplicity of MACT requirements with existing VCM NESHAPS requirements.

W. C. Holbrook

SAY

EXISTING NESHAP IS MACT FOR PVC INDUSTRY

MUST: RETAIN VCM NESHAP FOR PVC/VCM

DISTINGUISH GENERIC NESHAP FOR OTHER VCM SOURCES / USES

WHAT EXISTS + RECOVER

OTHERS RECOVER

JOE LEONINA ON BEHALF OF VI TUESDAY / WEDNESDAY
TO SPEAK

CTL015729