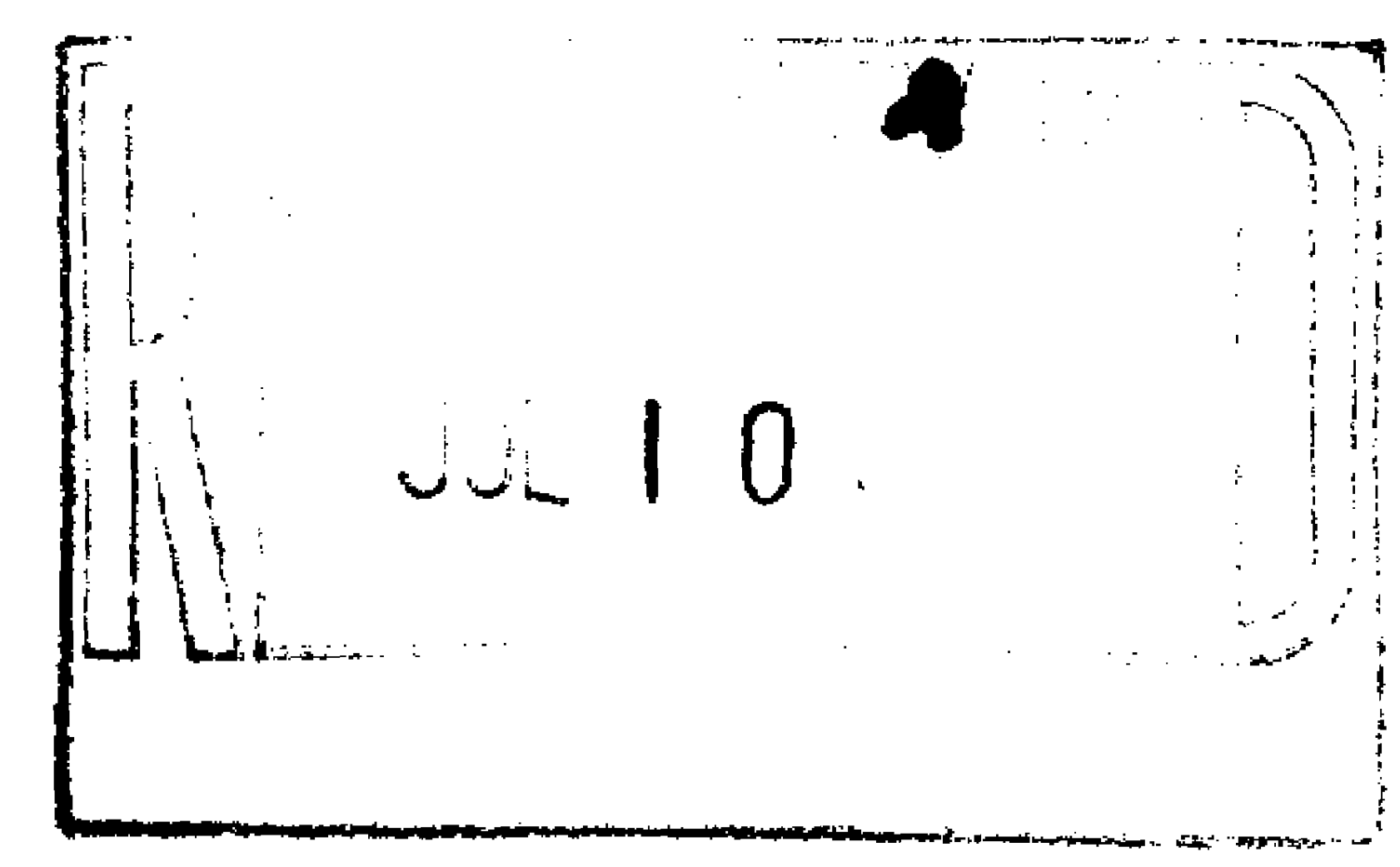


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TO: Plant Managers

FROM: J. C. Ledvina

DATE: July 3, 1986

Interoffice
Communication

SUBJ: IMPACT OF EPA PROPOSAL TO CHANGE HAZARDOUS WASTE DEFINITION

VISTA

On June 13, 1986, EPA proposed a revised method for determining whether a waste is hazardous. This is important to Vista because much of our solid waste and most of our wastewaters will be hazardous waste if the method is finalized as proposed. The new method should be promulgated in final form by March, 1987.

The new test is known as the Toxicity Characteristic Leaching Procedure (TCLP). The proposed test would revise the existing extraction procedure toxicity test (EP Toxicity Test) and involves examining for the leaching potential of 52 chemicals. If one of the chemical constituents from the waste leachs during the test at a level exceeding its regulatory threshold, the waste would be defined as hazardous. Liquid wastes, such as wastewater, would be analyzed without first leaching.

Threshold levels for constituents effecting Vista are:

	<u>THRESHOLD (MG/L)</u>
Benzene	0.07 (70 ppb)
Cadmium	1.0
Carbon Tetrachloride	0.07
Chloroform	0.07
Chromium	5.0
1,2-dichloroethane	0.40
lead	5.0
Mercury	0.2
Toluene	14.4
1,1,2-Trichloroethane	1.2
Vinyl Chloride	0.05 (50 ppb)

For example, vinyl chloride has a regulatory threshold of 50 ppb. Under the TCLP, solid waste such as wastewater sludge, PVC scrap, off-spec PVC, and reactor culls is extracted with distilled water. The water is then analyzed for vinyl chloride and if it contains more than 50 ppb vinyl chloride, the waste is hazardous. Under the existing EP Toxicity Test, none of the wastes mentioned above is hazardous. Current disposal costs are minimal, probably under \$20/ton. If the waste is hazardous under the new TCLP, disposal costs will be at least \$100/ton plus freight.

In addition to the actual disposal cost, the plants will need to permit and modify facilities where these wastes are being accumulated or stored. Vista has purposefully made an effort to keep facilities out of the hazardous waste program because of

Plant Managers

Page 2

July 3, 1986

4

regulatory burden, the cost of operating such facilities, and the cost of continually upgrading facilities to meet changing requirements.

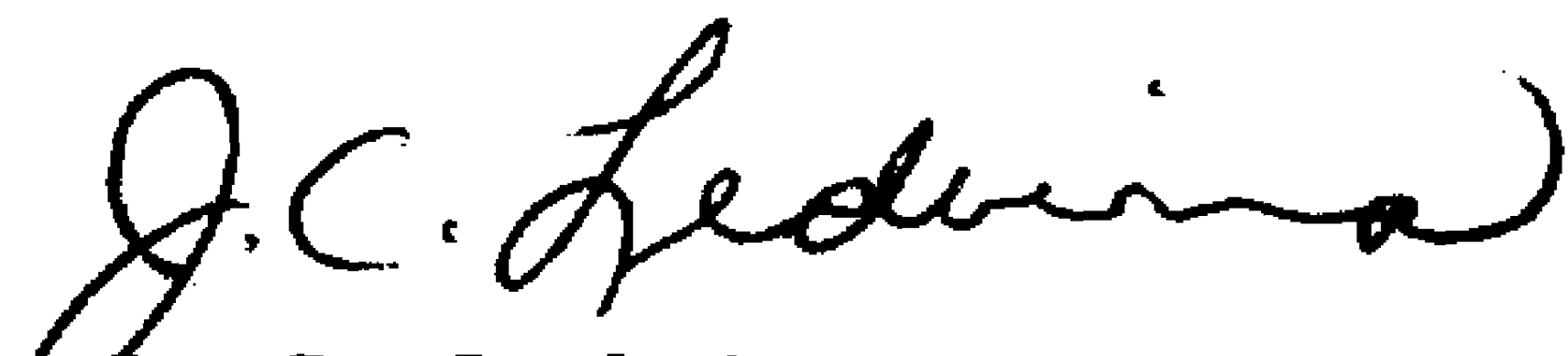
Of more concern is wastewater. Wastewater going to the ponds at both OKC and Aberdeen contains more than 50 ppb vinyl chloride. Under the proposal, the ponds will be receiving hazardous waste. Permits will need to be obtained and installation of double liners in some of the ponds will be necessary.

EPA is asking for comments on this proposal. Vista will provide comments directly and through trade associations. However, the probability of significantly changing the proposal is low.

The Plants need to start preparing now. The first step is to determine whether wastes will be hazardous under the TCLP. Baltimore and Lake Charles have indicated they will purchase the equipment necessary to run the TCLP. Other locations will need to decide whether to purchase, rely on outside laboratories, or to use the Baltimore and Lake Charles facilities.

Secondly, each location needs to evaluate the practicality of eliminating the waste or reducing the toxic constituent concentration. If these are not practical, upgrading facilities to regulatory standards will be necessary. We will continue monitoring this situation and keep the plants informed of new developments.

Please give me a call if you would like to discuss this further.


J. C. Ledvina

ajo/4

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