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FROM W. Miringoff

AT Burlington

COPY TO

SUBJECT SPI Technical Subcommittee on EPA Meeting of September 3, 1975
To Review Proposed Vinyl Chloride Standard

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The details of the regulation were reviewed and comments will follow:

In general, there was a great deal of confusion and a sense of lack of definition as to the testing frequency and methodology. The group requested that a meeting be arranged with some of the enforcement people at Durham to review in detail some of the reasoning and expectations of that group.

It was also proposed that a meeting with D. Goodwin be arranged at which written composite comments would be presented to him. The tentative proposed schedule for the above is to send everyone's written comments to the SPI by the 11th of September; meet to review and consolidate on the 17th; go to Durham on the 25th.

This schedule is questionable in that the timing of the publishing in the Federal register might be faster than anticipated. John Lawrence will call Don Goodwin and explore the possibilities.

Page 49 (Preamble)

The key note on this page is the explicit need to monitor vent streams with a multipoint detector. The legal people at the meeting made the point that the preamble to the regulation is deemed to be in effect a part of the regulation and that any statements in it are to be dealt with seriously.

Page 56 Applicability 61.60 (a) (1) (2) (3)

A specific written portion of 1, 2 and 3 should be written in to exclude pilot plants, laboratories, research and development and non commercial facilities.

Page 57 (i)

The definition is for dispersion resin.

The definition for "grade of resin" is left out (should be the same as on page 27).

Page 58 (m) (r)

(m) "Inprocess wastewater"....This definition should include the phrase

"excluding wash water from equipment which has met the opening requirements"

(r) the phrase "or equivalent" should be added.

Page 59

Others proposed that in (a)(1) for E.D.C. that the phrase "in vinyl chloride service" be added.

Page 60 (iii)

The definition of "one hour average" is being interpreted to mean that the sample must be taken for a one hour period even if the venting has stopped and all that is being drawn in is clean air (test 106).

Page 61 (A)(1)

The proposal is to alter the technique to read "so that the partial pressure of vinyl chloride in the equipment is no greater than 375 mm Hg absolute..."

A proposed addition to this paragraph is to set the limit so that vessels under 25 gallons are exempt as long as the pressure is reduced to 0 psig before opening.

Page 62

Change 45 days to 90 days.

Page 63 (b)(1)

Add phrase "in vinyl chloride service".

Page 64(i) Transfer operations: A

To add a phrase on the end of the paragraph

"Except if the volume contained in the section to be opened is less than five (5) gallons."

Page 65 () Leakage from relief valves:

There was a great deal of serious comment to the concept of interposing a rupture disc between the process and the relief valve.

The prime objection and the one which we should use to appeal to the EPA is

"Safety"

The technical reasoning is as follows:

If the rupture disc develops a "small weep," the VCM will leak into the space between the R/D and the relief valve. When a pressure rise in the vessel occurs, the rupture disc will not burst at the correct pressure because it has a balancing pressure from the gas in the space between itself and the relief valve. Therefore, the vessel will seriously overpressure and could explode. The one way to eliminate the above problem is to put a weep check in the space between the R/D and the relief valve in conjunction with a maximum pressure indicating gauge. This however will permit VCM seepage into the room which will have to be picked up by local multipoint detector beads or with a routine walkaround operational check using an OVA monitor.

~(1) 25 gallon exemption.

Page 66 (vi) Sample flask

The need to purge back into the process is only "During vinyl chloride sampling" not after the flask has been taken into the lab.

Page 68 (3)

define discharge as "discharge to the atmosphere"

change "equipment that is open" to "equipment that is to be opened".

Page 69(5)

Change "is open" to "is to be opened".

(i)(A) Object to the 2000 ppm on an individual company basis. Go for 5000 ppm.

Page 70

(i)(A) ~~Unloading~~ Operation:

Change to ~~exclusion~~ of any volume less than 5 gallons or try for a maximum volume definition. If not, go for an exclusion of a valve to valve coupling.

Change "Any vinyl chloride removed"... to "Any vinyl chloride discharged..."

Page 71

(iii) Unsafe: same as Page 65 (iii).

(iv) Put in a clause to permit manual venting of reactors to the atmosphere to preclude activating the pressure relief valve in an emergency (This was not unanimously agreed to).

Page 72

- (2) exclusion for volumes less than 25 gallons.
- (vii) change 45 days to 90 days for program submitted.

Page 73

(B) add to end of paragraph to exclude wash water from vessels which have met opening requirements.

(1) test method 106 is deemed to be very poor and not applicable with Teddler bags to high stacks etc. It was recommended that there should be a phrase "or equivalent" inserted plus some proposed written equivalent tests.

Page 75

(i) like any pollution test, it should be run at a maximum since that will legally set the maximum operating rate that is permissible.

Page 76

The formula on this page has a constant which reflects excess air required for combustion. Others at the meeting thought that the amount of excess air was much too low and should be corrected.

(v) No one could really figure out to what portion of the process this paragraph and the subsequent equation pertain.

Page 81

(1) What is the required frequency of testing? No one seemed too clear. A get together with the enforcement people is recommended.

(2) Test method 107 (add or equal)

(i) It was strongly recommended that statistical rather than every bag testing be utilized. In conjunction would be required approved procedures as well as a record that they were properly employed.

Page 82

(iii) change the sentence to read "...and shall be measured on a total solids basis."

Page 83

(3) Rather than sampling each opening, a prescribed procedure as well as statistical sampling should be called for

(i) The equation should be

$$C = \frac{W(2.16) (10^{-6}) (C_b)}{YZ}$$

C_b = ppm by volume vinyl chloride

A comment was also properly made that in order to carry out the test of the reactor, the reactor must be open. If the reactor is open, then an OSHA problem exists with VCM escape into the reactor room. If an exhaustor is used to keep the VCM from the room, then the sample readings will be meaningless. This poses a rather difficult situation which must be resolved.

Page 84

(ii) Two standard deviations from a mean concentration for each point is a moving target as well as one which can cause a response to a very low change and no response to a very high change. This technique is not valid for reactions to leaks.

What the group proposes is "that if the concentration exceeds 10 ppm then this would constitute a leak and result in the called for action."

Page 85

(v) The recommendation is that a sound technical procedure be approved rather than specific testing for each case.

General

In the section where an administrator approves the multi point system layout, that a phrase should be written in to permit relocation of points based on operating experience.

Piping although not specifically mentioned is deemed to be covered by the word "equipment" and therefore must be treated in the same manner.

WM:db