

The Vinyl Institute

Manufacturing Practices Committee

PRELIMINARY AGENDA

Innisbrook
Tarpon Springs, Florida

Wednesday
September 11, 1985
1:00 p.m.

1. Discussion of June 18 Submission by Formosa Plastics Corporation in compliance with the Consent Order signed between the corporation and the State of Delaware Department of Natural Resources and Environmental Control
2. Status Report on EPA proposed regulations, as published January 9, 1985 (10 FR 1182)
3. Update and Discussion on NRDC v EPA
4. Discussion of EPA Guidance on Federally Permitted Releases
5. VI Safety Award 1986
6. VSCA Presentation by Roy T. Gottesman
7. Discussion of Proposed Federal Legislation
8. Other Business

CTL020083

meeting

SI

August 20, 1985

TO: Manufacturing Practices Committee

FR: Meredith N. Scheck

There will be a joint meeting of the Manufacturing Practices Committee and the Safety Subcommittee at 1:00 p.m. on September 11, 1985 at Innisbrook at Tarpon Springs, Florida in conjunction with the Vinyl Chloride Safety Association meeting. A preliminary agenda is enclosed.

Please indicate your attendance on the attached form and return by September 6, 1985.

See you in Florida,

Meredith N. Scheck

MNS:ms

attachments

CTL020084

ADDRESSEES:

The Honorable Jeffrey G. Mack
House of Representatives
State of Delaware
216 Moores Avenue
Baldton
New Castle, DE 19720

The Honorable Thomas R. Carper
U.S. House of Representatives
1020 Longworth House Office Building
Washington, D.C. 20515

REVISION III

Dear _____:

The Vinyl Institute and several of its member companies read your comments on the January 9, 1985 proposed revisions to the vinyl chloride standard. We are also aware of the Formosa Plastics lawsuit and your interest in that issue. Your comments on the vinyl chloride standard appear to be based on the Formosa situation.

Formosa Plastics has proposed a number of projects to prevent future emergency vinyl chloride releases. One of those projects involves installation of a vinyl chloride gas containment system. The Vinyl Institute is concerned that such a system, which has always proven inadequate and impractical, will be construed as a real solution to the problem of prevention of vinyl chloride releases and in particular, emergency discharges from polyvinyl chloride reactors. We are writing you to state the Vinyl Institute's position on these systems and to suggest a better and more realistic way of preventing emergency vinyl chloride releases from polyvinyl chloride plants.

Containment systems, or so-called gasholders, have been scrutinized over the past ten years by industry and EPA for possible use in preventing releases of vinyl chloride to the atmosphere. Essentially everyone in the industry has concluded that gasholders will not reliably prevent releases and that they are inherently unsafe. Because most emergency releases contain both solid polyvinyl chloride and gaseous vinyl chloride, we fear that the vent lines leading to gasholders could plug with polyvinyl chloride thus resulting in a catastrophic release or explosion. EPA's contractor, Radian Corporation, has similar concerns regarding gasholders and so stated in their report "Relief Valve Discharge Performance Under Current Vinyl Chloride Standard" (add citation)

Many emergency vinyl chloride releases have occurred from polyvinyl chloride reactors when reaction conditions became out of control thus resulting in overpressurization. The best method of preventing releases from polyvinyl chloride reactors, in our opinion, is to install a system to control overpressure by very rapid batch deactivation (colloquially known as "shortstopping"). Shortstop systems exist that can stop a reaction, and thus prevent a release under adverse conditions such as power loss, cooling water failure, or loss of mixing in the reactor. We believe a good system of this type would be more effective and safe in preventing emergency vinyl chloride releases from reactors, than the gasholder containment system proposed by Formosa.

A huge containment system is required to completely contain the potential VCM release from all plant reactors in an emergency. If the containment system is not large enough, a release will still occur in an emergency situation. Steps must be taken to regain control of the reaction if a release is to be avoided. The safest approach is to effectively shortstop the reactors quickly.

We want you to know that containment systems alone are not an adequate way to deal with accidental emissions. Vinyl Institute member companies have emphasized avoiding overpressure situations by utilizing shortstop systems. We believe this, along with sound training and maintenance programs, provide the safest and most effective means for eliminating vinyl chloride releases.

Very truly yours,

Roy T. Gottesman

CTL020086



August 14, 1985

To: The file
From: Dr. Roy T. Gottesman
Re: Formosa Plastics -- Delaware City Plant

On August 1, I called Bob Boyer, Plant Manager of Formosa Plastics (302/836-2211). Since Boyer was on vacation, I called him again on August 5 and indicated that we were curious about any further action between Formosa Plastics and the Delaware Department of Natural Resources concerning their compliance order. Boyer advised me that Formosa had taken some of the advice from the Manufacturing Practices groups recommendations at the June 10 meeting in the Vinyl Institute's offices. They are using de-gassing tanks as a containment system, but they did decide to use the bullet vessels as surge tanks for the recovery system.

In response to my question, Boyer indicated that they had submitted this proposal in writing to Delaware's Department of Natural Resources and that it was a simple proposal.

He further stated "they more or less accepted it."

I inquired whether we could receive a copy of their submission and Boyer indicated that he was not at liberty to give the document to us but would check with their lawyers, as he saw no reason why we should not have it. I told him I hoped they would make the document available to us but, if for any reason this was not the case, we would then be forced to obtain a copy by the Freedom of Information route.

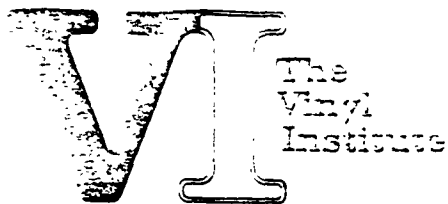
Roy

cc: All members of the Manufacturing Practices
Committee
Meredith Scheck

A Division of

CTL020087

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.
355 LEXINGTON AVENUE • NEW YORK, N.Y. 10017 • (212) 503-0600



August 13, 1985

TO: VINYL INSTITUTE Manufacturing Practices Committee
FR: Meredith N. Scheck
RE: Formosa Plastics Corporation: Consent Order Submission

Bob Boyer, Plant Manager of Formosa's Delaware City facility, has forwarded us the attached copy of Formosa's June 18 submission to the Delaware Department of Natural Resources and Environmental Control. Copies of the process flow diagrams and the containment system design (which were attached to the submission) are in our files. Should you wish to review these, please let us know.

M. A. Scheck

cc: C. Montgomery

503-0600

CTL020089

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THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

355 LEXINGTON AVENUE • NEW YORK, N.Y. 10017 • (212) 573-9400



FORMOSA PLASTICS CORPORATION DELAWARE
P.O. BOX 320 • DELAWARE CITY, DELAWARE 19706 • TEL (302) 834-4575

August 6, 1985

The Vinyl Institute
355 Lexington Avenue
New York, New York 10017

Attention: Mr. Roy T. Gottesman

Gentlemen:

Attached is a copy of Formosa's submission to the State of Delaware Department of Natural Resources and Environmental Control for a VCM containment system. The proposal is essentially a conceptual drawing providing a minimum of detail. Based on our discussions with the State and Robert Allen, the EPA consultant, the proposal has been accepted providing we continue to supply detail design as we go along for review and comment by Robert Allen.

Should you have additional questions or suggestions, please feel free to call me.

Sincerely,

Robert W. Boyer
Plant Manager

RWB:11
Attachment

CTL020090