



Interoffice Communication

To EPA VCM Standard Distribution

From David A. Kuhn

Date June 9, 1977

Subject PROPOSED AMENDMENTS TO THE EPA VCM STANDARD

You all have been sent a copy of EPA's proposed rules to amend the VCM standard based on the settlement agreement between EPA and EDF. I'm sure by now you recognize there are some significant new restrictions placed on the industry, especially with regard to plant modification or new plant construction. It is in Conoco's best interest to critique this proposal by submitting timely comments. Note that the deadline is August 1, 1977.

For each of you desiring to submit comments, please send them in writing to me by July 10, 1977. I will compile them into a single document and return my draft to you for approval. After the necessary modifications I will forward the document to EPA.

The most effective comment is positive, quantitative, objective and analytical in nature. Its purpose is to do the best we can to help EPA write a better regulation.

Attached are some of the issues you may wish to address, particularly by supplying facts, better solutions and cost impacts.

DAK/vm

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*Letter out to
Kuhn 7/22/77*

VVC 000020016

ISSUES RAISED BY THE EPA AMENDMENT OF THE VCM STANDARD

- (1) What is the decision logic behind requiring the lowest level achievable emission reduction?
- (2) What is the new evidence which causes EPA to amend the standard in effect for less than a year?
- (3) Is requiring a 5 ppm limit on emissions from new oxychlorination reactors really as simple and inexpensive to accomplish as the preamble implies?
- (4) Is reducing the amount of residual VCM allowed in resin the best way to lower emissions from existing PVC plants? What's a better way?
- (5) Emissions offsets would prevent a new PVC plant to be located next to an existing VCM plant, which would make continued delivery of VCM by rail car or by a long pipeline necessary. When balancing the safety of this trade-off, wouldn't eliminating rail cars cause a greater risk reduction?
- (6) The requirement for emissions offsets makes no sense for plant modification where the emissions remain the same, even though the production increases.
- (7) Why would anyone want to slow down production in his plant to gain emissions offsets?
- (8) Based on the original EPA standard, how many fewer deaths would be predicted by the lowered VCM emissions?
- (9) Will the proposed amendments have an insignificant impact on energy consumption?
- (10) With all the potential economic impacts which they say they cannot quantify, how can the EPA blithely determine that the amendment does not represent a major proposal requiring preparation of an economic impact analysis?
- (11) What's our assessment of the cost information for replacing the air oxy-chlorination system with one that's based on pure oxygen?

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