THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

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JUN 16 1975
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EPA TECHNICAL COMMITTEE MEETING WITH EPA EMISSIONS STANDARDS AND ENGINEERING DIV., DURHAM, N.C.

EPA Conference Room
Durham, N.C.

May 20, 1975
8:30 a.m.

Attendees:

For Industry: Ray Abramowitz, Hooker Chemical Corporation, Gary H. Baise, Ruckelshaus, Beveridge, Fairbanks, & Diamond, W. Bailey Barton, Borden, Inc., Robert Fine, Hooker Chemical Corporation, W. C. Holbrook, B.F. Goodrich Chemical Company, R. W. Laundrie, General Tire, John Lawrence, Society of the Plastics Industry, Cecil Loechelt, Ethyl Corporation, W.W. Madden, Firestone Plastics Company, Coe Wadelin, Goodyear Tire and Rubber Company, Research Division, R.N. Wheeler, Jr., Union Carbide Corporation

For EPA/ESED: Leslie B. Evans, Jack Farmer, Don Goodwin, Chuck Kleeberg, Susan Wyatt

1. Mr. Lawrence cited the general items in the second draft of the EPA National Emmission Standard for Vinyl Chloride that the committee wished to review. and comment on. He further indicated that the purpose of the meeting was to continue the open exchange between EPA and Industry to establish a practical and realistic standard.

2. Mr. R.N. Wheeler made a presentation on Fugitive Emissions (Attachment A) that covered the following major points:

   - Material balances
   - Multipoint analyzer as a monitor of fugitive emissions
   - Leak detection program
   - Sealless pumps
   - Relief valves
   - Opening of equipment

3. Mr. Coe Wadelin reviewed various aspects of the analytical procedures as follows:

   - Analytic methods other than gas chromatography and the call for continuous monitoring
   - Method 106 - Determination of Vinyl Chloride from Stationary Sources.

     Desirable to include use of charcoal tube as an alternative.
     - Detection limits

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- Automatic Integrator
- Sampling procedure (question of flushing line into the sample bag).

. Method 107 on residual vinyl chloride in PVC

- Integrator recorder
- Sensitivity - (solution method should be okay).
- Waxed lined bottle cap

. Other analytical testing procedures were discussed in a separate discussion between Mr. Wadelin and a representative from the EPA's Technical analysis staff. This will be written up in a separate report by Mr. Wadelin.

4. Mr. Laundrie presented Mr. Barr's comments on the following:

. General Emmission Concentrations
. Material Balances
. Manual Venting
. Averaging of Residual Monomer by grade
. Effluent

These comments are included as Attachments B, C, D, E and F.

5. Mr. Cecil Loechelt made a presentation on Sources Following the Stripper (Attachment G) covering the following major points:

. Slurry blend tank vents
. Relief valves down stream from stripper
. Cost of administration and keeping of records
. Concept of 400 ppm from stripper being a "action level"

6. Mr. W.W. Madden reviewed the industry's position on requesting the level of vinyl chloride in dispersion resins leaving the dryer going to 6000 pppm rather than the 2000 ppm EPA has now included in its draft standard. There was considerable reluctance on the part of EPA to change this proposed level.

7. Mr. W.C. Holbrook raised the question of emission level from the oxy-vent as to whether it is 0.01 kg/100 kg of total or oxy-vent EDC.

8. Bailey Barton discussed some of the confusion that seems to exist in the times, duplicity and record keeping procedures called for.

. Record keeping on leaks
. Multipoint recorder records not requiring reports
. Definition of production rate
. Definition of certification
. Is there really need for all records if enforcement will not use such data.

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9. Although Mr. Goodwin would not indicate any specific changes that would be made in the proposed standard, it appears that they are receptive to changes in the following areas:

   - Averaging the residual monomer in suspension resins leaving the stripper.
   - Material balances over periods longer than one month. (Perhaps six months.)
   - Blend tank controls might be eliminated if it can be established that the cost-benefit ratio is too high.
   - Changes will be considered with respect to the requirement that the pressure in equipment must be reduced to 15 mm Hg prior to opening to allow for an alternative.
   - Manual venting might be permitted to off-set a major emergency release of vinyl chloride.
   - Record keeping requirements may be simplified.
   - The level of vinyl chloride from the oxy-vent will probably be changed to "not exceed 0.022 kg/100 kg of total EDC product."
   - It is not likely that the residual vinyl chloride in dispersion resins will be allowed to exceed an average of 2000 ppm.

10. It was Mr. Goodwin's opinion, when questioned, that the Standard would issue between July 4 and Labor Day.

11. The meeting adjourned at 12:30 p.m.

Respectfully submitted,

John R. Lawrence Jr.

John R. Lawrence
Technical Director

JRL/sdf

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