



UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS

P. O. BOX 8361, SOUTH CHARLESTON, W. VA. 25303

May 19, 1980

Larry M. Corcoran, Esquire
Environmental Defense Fund
1525 18th Street, N.W.
Washington, D.C. 20036

Dear Mr. Corcoran:

Your letter dated April 18, 1980 to Mr. Douglas M. Costle, Administrator of the Environmental Protection Agency regarding the NESHAPS standard for vinyl chloride requesting stricter enforcement of the regulations requiring prevention of vinyl chloride emergency releases contains two serious errors:

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"Recently EDF met with representatives from industry to discuss ways to further restrict vinyl chloride emissions. It was agreed that if additional efforts are to be made, the greatest return on these efforts will be had from stricter enforcement of the current emergency discharge restrictions, 40 C.F.R. 61.65(a) and the promulgation of the pending amendments to the standards which will lower the emission limits for resin stripping, 42 Fed. Reg. 28154 (June 2, 1977)"

The function of the industry-EDF meeting you mention was to frankly discuss differences between the industry position and that of EDF with the hope that mutual understanding of one another would lead to a clarification of the issues. There was also some small hope that through candid exchange of ideas some movement away from the present adversary positions could be achieved. This hope now seems gone since EDF has chosen to erroneously state that industry is in agreement

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with the same old general EDF position of no vinyl chloride emissions.

There was no agreement between industry and EDF on the points in your letter and there probably will never be between two adversaries.

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"That emergency discharges need not occur is also apparent from the data we have reviewed. The Union Carbide South Charleston Plant had no emergency discharges during the period of 1979 for which reports are available. In the entire time reports have been made, Union Carbide had only three emergency discharges at South Charleston. None were due to personnel error or instrument error. Each was due to premature rupture disc failures. Union Carbide will never have such a failure again because it is replacing its rupture discs with O-ring pop valves."

Union Carbide's South Charleston Plant produces vinyl chloride copolymer resins by UCC's unique continuous solution polymerization process. Operating conditions, controls and the plant are not similar in any respect to the batch suspension, dispersion or bulk PVC processes operated by the rest of the industry thus the citing of Union Carbide's South Charleston Plant as the paragon of perfection is a serious technical error in E.D.F.'s part. It also should be obvious if rupture discs are removed, there will be no more emergency releases due to premature rupture disc failure. There are many technical reasons why the emergency relief devices used at South Charleston may not be satisfactory for other PVC plants. The reverse situation may also be

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true. For now it should suffice to say that emergency relief devices should be selected by the knowledgeable, competent, experienced persons who design and operate a particular facility.

Needless to say I don't agree with the recommendations in your letter to Mr. Costle but EDF has a right to express the opinion of its constituency. I do believe, however, that EDF should support its opinions with facts.

Very truly yours,



R. N. Wheeler, Jr.
Assistant Director
Product Safety

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cc: Gary Baise, Esq.
Douglas Costle, EPA
Joseph Hadley, Esq.
R. W. Laundrie, Esq.

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