

agenda

SP

JOINT MEETING HEALTH, SAFETY & ENVIRONMENT COMMITTEE AND LEGAL COMMITTEE

South Seas Plantation
Captiva Island, Florida
Meyer Room

Thursday
May 10, 1990
1:30 p.m.

I. OPENING OF MEETING/SELF-INTRODUCTIONS

F. Borrelli *Georgia Gulf*
/R. Luss *Oxy*

II. TOXICITY CHARACTERISTIC LEACHING PROCEDURE

Review of final rule and group discussion
by member company representatives.

J. Ledvina *VISTA*

SEE HANDOUT

III. TRANSPORTATION: EAST COAST RAIL SAFETY

M. Scheck *VI*
/F. Borrelli *Georgia Gulf*

- VI Survey Results
- Update on Network/Group Discussion

IV. OSHA - EDC

- ✓ Litigation Update
- ✓ VI Survey: Seminar on Engineering
- 5 RESPONSES BACK - ALL POSITIVE Controls
- SEND - 3-5 PEOPLE COMPANY. (HOUSTON or BATEL ROVER)
- PROPOSAL 9/11 IN HOUSTON
- DECISION ON 7/17
- 1. HUNG UP IN COURT. Use 1/2 FACE

P. de la Cruz
C. Graybill *PPG*
Judy/SOP Tino FRAMES
R. Luss
/P. de la Cruz

VI. LEGISLATIVE UPDATE: CLEAN AIR ACT

VII. OLD BUSINESS

- ✓ Vinyl Chloride Rule
- New Jersey Labeling Update
- Ontario: Level One Study
- FO24 Waste Stream Survey
- Catalytic Oxychlorination Process of Aliphatic Hydrocarbons as New Sources of Dioxins

M. Scheck *EXHAUST LIMIT*
10PPM EXHAUST LIMIT
15/1000 IN REMOTE
P. de la Cruz
J. Ledvina
W. C. Holbrook *B.F.G.*
M. Scheck
M. Scheck

(BFG IS AWAY -
UNSTO WATER
HAVE NOT FOUND
ANYTHING.

3 YES
4 ADDITIONAL
DISCUSSION
1 NO
VISED TO
THOMAS
ARE 50 PEOPLE
AN REACT TO
DIFFERENT
IMMEDIATE
RESPONSE
ARE 15
DRIVING
FORCE
SEE MY
MINUTE
ON BACK

RULE WILL GO
AS PROPOSED.
NOTHING -
DON GOVERN OXY IT'S
RIGHT TO KNOW.
DRAFT HAS NOT
SUBMITTED.

SENT NATIONAL TO MEMBERS

R&S147906

VIII. NEW BUSINESS

- Waste Minimization: Recycling of catalyst drums *MOST USE 1-5 GAL JUGS. DOT DOESN'T ALLOW REUSE. BULK IS A SAFETY PROBLEM. GO TO SUBCOMMITTEE* J. Ledvina
- Groundwater: Individual member company representatives will discuss activity related to this issue. *POSPOBOND TO NEXT mtg* F. Borrelli

- Other

IX. ENFORCEMENT UPDATE

X. NEXT MEETING DATE

DECEMBER-SEPT. 26

XI. ADJOURNMENT

NESHOR \$687M SETTLEMENT

LOTS OF PILOT PLANT PROBLEMS.

TRG IN BIG PROBLEM.

LOTS OF PROBLEMS WITH NON COMPLIANCE.

*2 INCIDENTS ON CRIMINAL ACTIVITY
FBI COMES IN WITH WARRANTS, SHUT
DOWN PLANT.*

*PROCEDURES, WHAT TO DO — ON
AGENDA FOR NEXT MEETING*

SOFT AUDITS NEED TO BE MORE THOROUGH, BACK TO SAMPLES, DOCUMENTATION.

*WITH PHILLIPS DEVELOPMENT, NEED TO 'LOOK AT
YOUR PRACTICES AS DESCRIBED IN REPORT.*

*— DELAWARE REGULATION WITH CHECK LIST, PROCESS
ANALYSIS (I.D. HIGH RISK AREAS)*

— USE OF CONTACT MGMT. / TRAINING.

*CRACKS TO GRAVE OF MARIANA PVC IS
GOING TO BE STUDIOS (FROM TECHNICAL
COMMITTEE)*

*INADVERTENT
UNDERGROUND
STORAGE.*

Group

Group

Group

TOXICITY CHARACTERISTIC

- PROMULGATED MARCH 29, 1990
- REPLACES EP TOX AS A CHARACTERISTIC OF HAZARDOUS WASTE
- USES DILUTE ACIDIC SOLUTION TO EXTRACT A SOLID WASTE (TCLP)
- WASTEWATERS ARE ANALYZED DIRECTLY WITHOUT EXTRACTION

*NON HAZARDOUS 20/TON
HAZARDOUS 200 TON
\$2000 incineration*

TC CHEMICALS FINAL RULE

*VCM ARE TWO of them
EDC*

- INCLUDES 25 NEW ORGANICS PLUS THE 14 EP MATERIALS

- VCM REGULATORY LEVEL 200 PPB; EDC 500 PPB

*PVC PRODUCERS GETTING < 4PPM
IN THEIR RAW RESIN. CAUSING
A LOT OF TESTING WITH PRODUCERS
THEIR FABRICATIONS*

- THE TCLP BECOMES THE NEW TEST

- TC WASTES BECOME HAZARDOUS SUBSTANCES
UNDER SECTION 101(14) OF CERCLA (RQ ADDED
AT 40 CFR 302)

EFFECTIVE DATE

- ALL GENERATORS OF MORE THAN 100[^] AND LESS THAN 1,000 KG/MONTH MUST COME INTO COMPLIANCE WITH SUBTITLE FOR MANAGEMENT OF THEIR TC WASTES WITHIN ONE YEAR OF PUBLICATION. (3/29/91)
- ALL GENERATORS OF 1,000 KG/MONTH OR MORE MUST COMPLY WITHIN 6 MONTHS OF THE DAY OF PUBLICATION. (9/25/90)

of hazardous waste

LAND DISPOSAL RESTRICTIONS (LDR)

6 MOS. EPA WILL
MAKE A DECISION
IF TC WASTE
IS BANNED FROM
LAND DISPOSAL.
(NOT PROBABLE TO
HAPPEN IN 6 MOS.
TIME FRAME)
SURFACE IMPOUNDMENTS
WILL BE BANNED 6 MOS. &
4 YRS.

- TC WASTES NOT IMMEDIATELY SUBJECT TO THE
LDR PROGRAM

COMMENT - EPA IS
MOVING TO TANK
IMPOUNDMENT, INSTEAD OF
STREAM/POND/TREATMENT

- NEWLY IDENTIFIED WASTE WILL BE SUBJECT TO
A SIX MONTH DEADLINE FOR LDR DETERMINATION
WITH NO HAMMER TO TAKE EFFECT.
- OWNER OR OPERATOR OF A NEWLY-REGULATED
SURFACE IMPOUNDMENT MUST RETROFIT 4 YEARS
FROM THE DATE OF PROMULGATION OF THE
ADDITIONAL CHARACTERISTIC.
- WASTEWATER SURFACE IMPOUNDMENTS COULD BE
REQUIRED TO RETROFIT SOONER ONCE THE LDR
IS PROMULGATED.

TABLE 1 - EP TOXICITY REGULATORY LEVELS

EPA HW Number	CONTAMINANT	REGULATORY Level (mg/l)
D004	Arsenic	5.0
D005	Barium	100.0
D006	Cadmium	1.0
D007	Chromium	5.0
D016	2,4-D	10.0
D012	Endrin	0.02
D008	Lead	5.0
D013	Lindane	0.4
D009	Mercury	0.2
D014	Methoxychlor	10.0
D010	Selenium	1.0
D011	Silver	5.0
D015	Toxaphene	0.5
D017	2,4,5-TP (Silvex)	1.0

TABLE 2 - TC REGULATORY LEVELS

EPA HW Number	CONTAMINANT	REGULATORY Level (mg/l)
D004	Arsenic(*)	5.0
D005	Barium(*)	100.0
D018	Benzene	0.5
D006	Cadmium(*)	1.0
D019	Carbon Tetrachloride	0.5
D020	Chlordane	0.03
D021	Chlorobenzene	100.0
D022	Chloroform	6.0
D007	Chromium(*)	5.0
D023	o-Cresol	200.0
D024	m-Cresol	200.0
D025	p-Cresol	200.0
D026	Cresol	200.0
D016	2,4-D(*)	10.0
D027	1,4-Dichlorobenzene	7.5
D028	1,2-Dichloroethane	0.5
D029	1,1-Dichloroethylene	0.7
D030	2,4-Dinitrotoluene	0.13
D012	Endrin(*)	0.02
D031	Heptachlor	0.008
D032	Hexachlorobenzene	0.13
D033	Hexachlorobutadiene	0.5
D034	Hexachloroethane	3.0
D008	Lead(*)	5.0
D013	Lindane(*)	0.4
D009	Mercury(*)	0.2
D014	Methoxychlor(*)	10.0
D035	Methyl ethyl ketone	200.0
D036	Nitrobenzene	2.0
D037	Pentachlorophenol	100.0
D038	Pyridine	5.0
D010	Selenium(*)	1.0
D011	Silver(*)	5.0
D039	Tetrachloroethylene	0.7
D015	Toxaphene(*)	0.5
D040	Trichloroethylene	0.5
D041	2,4,5-Trichlorophenol	400.0
D042	2,4,6-Trichlorophenol	2.0
D017	2,4,5-TP (Silvex)(*)	1.0
D043	Vinyl chloride	0.2

(*) On the EP Toxicity constituent list

R&S147913