



INTER-COMPANY AND OFFICE CORRESPONDENCE

TO C. A. Mills

SUBJECT Vinyl Institute Health, Safety & Environment
Committee Meeting - San Francisco - 9/21/88

DATE September 29, 1988

FROM J. C. Lunn

DIV./DEPT Technical

ADDRESS Geismar, LA

TELEPHONE 622

Highlights of the Vinyl Institute 9/21/88 meeting are as follows:

1. Safety Subcommittee Recommendations

The Safety Subcommittee has recommended to the VI Board that the following statement be added to the Mission Statement of the Vinyl Institute. The safety goal shall be "To promote the Vinyl Industry to be the safest segment of the Chemical Industry."

The objectives of the Safety Committee shall be to:

- A. Share safety related information which can improve the overall Vinyl Industry safety record.
- B. Promote safety programs for the Vinyl Industry.
- C. When appropriate, review and prepare comments on Governmental/Vinyl Industry safety issues.
- D. Assist in recognizing and publicizing outstanding safety performance in the Vinyl Industry.

In order to assist in meeting the first objective, a proposal has been made to share incident reports concerning safety within VCM or PVC plants. A suggested format is attached for review and approval. Information would be transmitted to Keller & Heckman, the law firm representing the Vinyl Institute. The member company could, at their discretion, remain anonymous when this information is transmitted to other VI members.

To meet the second objective, a series of "workshops" have been proposed to share safety information within the Vinyl Institute. The members agreed that this program would be more task oriented than the Vinyl Chloride Safety Association annual meeting. Workshops would be held on such topics as VCM fire fighting procedures, VCM loading/unloading operations, protective equipment practices, etc. The intent is to bring together the various disciplines in centrally located areas (such as Baton Rouge or Houston) for one day workshops to thoroughly review safety practices for one or two topics in a focused manner. Member companies concurred that it would be beneficial to share this type of safety information since one major VCM incident at any plant could seriously affect the vinyl industry as a whole.

BOR 009081

BOR-009081-00

BFG62047

25013131

2. EPA PROPOSED BENZENE STANDARD

The EPA is currently revising its benzene standard based on the vinyl chloride standard settlement agreement. Essentially the agreement states that EPA must establish a safe level for a chemical prior to reviewing other impacts such as cost of compliance. Benzene is the first such review. EPA has proposed several methods of determining risk and are leaning toward a generic determination. Attached are comments to EPA from the Idaho Mining Association concerning the benzene standard generic approach. This Mining Association is concerned with radionuclides for which specific information on risk is available (similar to VCM) and that a generic approach may lead to a stricter standard. The Vinyl Institute also supports a case by case approach versus a generic risk determination.

3. CERCLA (SUPERFUND) HAZARD RANKING SYSTEM

EPA is sending its new proposal for updating the hazard ranking system (the method of determining which sites become Superfund sites) through internal channels for approval. The VI expects the new H.R.S. to be published in the Federal Register at any time.

4. TCLP RCRA REVISIONS

The toxic characteristic leaching procedure (TCLP) which is now called toxic characteristic (TC), standards are expected to be issued late this year or early next year prior to any administration change. The TC will set the standards for determining a hazardous waste. Of concern to VI members is that some metals such as lead may be a problem in certain PVC compounding resins. This standard could make waste-waters from chemical plants a hazardous waste under RCRA. For instance, the VCM standard as now proposed could be as low as 50 parts per billion VCM allowed in wastewater.

5. OSHA LABELING UPDATE

OSHA dropped the proposed PVC labeling violation against the Oxy Addis facility. The VI will send member companies updates on this issue.

6. CALIFORNIA PROPOSED MCLs

California's Department of Health Services has proposed maximum contaminant levels for VCM in drinking water systems which are much more stringent than EPA standards. Their proposal could seriously affect the use of PVC pipe in California since the California standard is 0.5 PPB versus the EPA current standard of 2 PPB and tests by the National Sanitation Foundation have shown that new PVC pipe with 2 PPM of residual VCM leached VCM into water at up to 0.78 PPB even after 30 days in service. The VI comments are attached.

7. SARA 313 RESPONSES

The SARA Title 313 member responses are being tabulated by the Vinyl Institute and will be distributed soon.

BOR 009082

BOR-009082-00

BFG62048

25019135

8. ENFORCEMENT UPDATE

BFG recently was fined \$50,000 for failure to follow the terms of a Settlement Agreement to the letter. BFG did not review the details but suggested that others review any agreements that they have outstanding and carefully follow. The enforcement agencies are giving little room for errors or omissions.

9. FEDERALLY PERMITTED RELEASES

EPA recently issued a definition of "Federally permitted release". The interpretation of Federally permitted release has been used by VCM/PVC manufacturers to exclude reporting certain VCM released to EPA. No one at this meeting had a copy of the proposed definition which supposedly was issued this past August. This definition will be passed on when a copy is available.

The next Committee meetings of the Vinyl Institute are scheduled for November 10 in Houston and December 6 in Kansas City.



J. L. Lunn

esr

Attachment

cc: W. P. Leonard
J. L. Russ
M. D. Owens
W. B. Barton
M. Thorsen
G. T. Hennings
H. J. Accardo
P. West

BOR 009083

BOR-009083-00

BFG62049

25019136