



Air Products and Chemicals
INC.

ESCAMBIA PLANT

INTEROFFICE MEMORANDUM

RE LIVED

JAN 20 1980

J. T. BARR

To: T. J. Regan

Date: 18 January 1980

From: L. W. Allen

Copies: R. E. Jones
R. E. Gilbert
~~J. T. Barr~~ J. T. Barr
D. E. Hoffman
R. L. Duggan

Re: Safety and EPA Expenses -
PVC Plant

1. The following safety and EPA expenses are listed below for FY79.

<u>AREA</u>	<u>\$M</u>
Depreciation	238
Sewer Repairs	32
VCL Monitoring	38
Breathing Air	5
Stripping Column Maint.	45
Thermal Oxydizer Maint.	20
Relief Valve Maint.	19
EPA Fill Water System Maint.	7
Area Lighting	5
Leak Patrol and Mask Repair	40
OSHA Ladders and Platforms	11
Gas Holder Maint.	57
Safety Supplies and Training	5
Environmental Services	164
Effluent Chemicals	20
Other Projects	22
Fuel	14
	<u>\$742M</u>

2. EPA and OSHA regulations have resulted in a loss of production amounting to 5.48MM (1230P) pounds per year.

- a) Steam Sweep (1230P)
2MM lbs. - N/L
1MM lbs. - S/L
- b) Column Boil-Outs (1230P)
700,000 lbs. - N/L
140,000 lbs. - S/L
- c) General Maint. (1230P)
320,000 lbs. Reflux Cond.
320,000 lbs. Seal Changes
1 MM Misc. Welding Repairs
1.640M

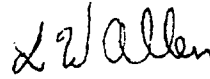
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3. Steam usage (# Steam/#PVC) of Batch Stripping versus continuous Stripping

- a) Batch Stripping - 0.788 #Steam/#PVC
- b) Continuous Stripping - 0.418 # Steam/#PVC



L. W. Allen

LWA:bg

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SUBSTANCE OF SUBMISSION TO EPA
CANCER POLICY RULE MAKING RECORD

The Environmental Protection Agency has repeatedly cited figures concerning the costs incurred by the vinyl chloride and polyvinyl chloride industries for in coming into compliance with its regulation of vinyl chloride emissions under §112 of the Clean Air Act. To ensure that the Agency is using proper figures and in order that the actual figures could be evaluated by the industry, the following data were developed by SPI's Polyvinyl Chloride Safety Group.

1. Cost of Capital Equipment Investments Required to Conform With OSHA and EPA Vinyl Chloride Standards from 1974 to Present - in millions of dollars.

<u>OSHA</u>		<u>EPA</u>		<u>TOTAL</u>	
VC	PVC	VC	PVC	VC	PVC
\$19.8	158.	79.4	119.	99.2	277.

2. Yearly Operating Expenses Required to Comply With OSHA and EPA Vinyl Chloride Standards from 1974 to Present - in millions of dollars.

	<u>OSHA</u>		<u>EPA</u>		<u>TOTAL</u>	
	VC	PVC	VC	PVC	VC	PVC
1974	\$0.6	3.7	0.8	3.4	1.4	7
1975	.9	4.8	1.4	4.1	2.3	8.9
1976	1.5	6.1	1.9	4.3	3.4	10.4
1977	2.2	7.6	2.6	5.3	4.8	12.9
1978	2.2	8.5	6.1	9.7	8.3	18.3
1979	2.8	11.9	10.4	19.5	13.2	31.5

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In the process of developing these statistics, SPI also collected capacity-related information. In so doing, The Society was able to quantify the loss of capacity attributable to the two regulations. Comparing nameplate capacity and practical operating capacity, it has been determined that the vinyl chloride producing industry can operate to only 93% of capacity and that the PVC industry can only operate to 89% of nameplate capacity. This reduction in capacity is due to process modifications required in order for the industry to obtain compliance with the OSHA and EPA regulations applicable to vinyl chloride.

This survey was conducted by mailing a copy of a survey form to each company for the preparation of a response. After the response was prepared a representative of The Society contacted each member company to gather the data. Based on the results obtained it can be stated that the foregoing data are based on responses from more than 80% of the entire vinyl chloride producing industry and over 60% of the entire polyvinyl chloride producing industry.

Should the Agency have any questions or comments regarding the foregoing, contact should be established with Mr. John R. Lawrence, Technical Director of SPI, at:

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