

The Society of the
Plastics Industry, Inc.

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TO: MEMBERS OF THE EPA TECHNICAL COMMITTEE
VCM AND PVC PRODUCERS GROUP

FROM: John R. Lawrence

RE: EPA STANDARD

Gentlemen:

In a discussion with EPA staff today, I was able to obtain some indication of the changes that may be proposed in the existing Standard on VC in the event that the pending EPA's/EDF suit is dismissed by the Court.

The following are the areas that EPA proposes to change if a new Standard is to be considered:

- 1 - In existing sources there will be a requirement to reduce vent emissions from 10 ppm to 5 ppm. If this cannot be accomplished without the addition of new equipment, there will be a relief clause that will allow a waiver in this requirement if conscientious effort has been made to achieve 5 ppm without success. It is EPA's expectation that "fine tuning" of existing emission control equipment will allow for this reduction over a three year period. This reduction would apply to both PVC and VCM operations.
- 2 - In new sources it will be necessary for all vents to operate on 5 ppm from start up. This will apply to the oxychloro vent in VC production as well as PVC operations.
- 3 - There will be a requirement to reduce the residual VC in PVC after the reactor to 100 ppm in suspension resins and 500 ppm in dispersion resins for new formulations. The existing requirement of 400 ppm in suspension resins and 2000 ppm in dispersion resins will continue to apply to old formulations. //
- 4 - The proposed change will go into some detail with respect to the desirability of achieving the first emission goal on the basis of new technology. EPA plans to re-evaluate the Standard every three years to consider whether new technology justifies the development of a tougher Standard.

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- 5 - The proposed regulation will call for new increase in the total emissions over the existing source based on expansion of the plant or the erection of a new plant at the same location. It is expected that this regulation will apply to the area within an 8 kilometer radius of the existing operation.

Please accept this information as preliminary and use it to start considering what changes would be required within your operations if these requirements do become part of the new regulations. Although there is no certainty as to when the new proposed regulation may be published, it is expected that it might be as early as June 1st.



John R. Lawrence
Technical Director

JRL:gm