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MANUFACTURING TECHNOLOGY COMMITTEE
PVC SAFETY GROUP
THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

SUGGESTED AMENDMENTS TO
THE VINYL CHLORIDE STANDARD

[Underlining denotes addition; ~~overstrike~~ indicates deletion.]

Part 61 - National Emission Standards
For Hazardous Air Pollutants
Subpart F - National Emission Standard for Vinyl Chloride

40 C.F.R § 61.61

(v) "Malfunction" means any sudden and unanticipated failure of process or pollution control equipment. A failure of process or pollution control equipment caused by design flaws, lack of normal maintenance, or careless operation may not be considered a malfunction.

Comment: This provision was derived from the benzene/styrene plant proposal at 47 Fed. Reg. 83461 (1981).

§ 61.64

Emission Standard for Polyvinyl Chloride Plants.

An owner or operator of a polyvinyl chloride plant shall comply with the requirements of this section and § 61.65.

(a) Reactor: The following requirements apply to reactors:

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(3) Manual vent valve discharge: Except for an emergency manual vent valve discharge, there is to be no discharge to the atmosphere from any manual vent valve on a polyvinyl chloride reactor in vinyl chloride service. An emergency manual vent valve discharge means a discharge to the atmosphere which could not have been avoided by taking available measures to prevent the discharge. Within 10 days of any discharge to the atmosphere from any manual vent valve, the owner or operator of the source from which the discharge occurs shall submit to the Administrator a report in writing containing information on the source, nature

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and cause of the discharge, the date and time of the discharge, the approximate total vinyl chloride loss during the discharge, the method used for determining the vinyl chloride loss, the action that was taken to prevent the discharge, and measures adopted to prevent future discharges.

Comment: This is a corollary of the Environmental Protection Agency's (EPA) definition of "malfunction." See 47 Fed. Reg. 83461 (1981).

§ 61.65

Emission Standard for Ethylene Dichloride,
Vinyl Chloride and Polyvinyl
Chloride Plants.

An owner or operator of an ethylene dichloride, vinyl chloride, and/or polyvinyl chloride plant shall comply with the requirements of this section.

(a) Relief valve or rupture disk discharge: Except for an emergency relief discharge, There is to be no discharge to the atmosphere from the operation of any relief valve or rupture disk on any equipment in vinyl chloride service. An emergency relief discharge means a discharge which could not have been avoided by taking measures to prevent the discharge.

(1) Discharges shall not be considered a violation of this provision if:

(A) The discharge is a result of a malfunction or an act of God, or

(B) The amount discharged does not exceed 100 pounds per discharge and, for polyvinyl chloride plants, the frequency of such discharge does not exceed the equivalent of one discharge per 2,000 batches charged.

(2) Within 10 days of any relief valve or rupture disk discharge, except those covered by section 61.65(a)(1)(B), the owner or operator of the source from which the relief valve discharge occurs shall submit to the Administrator a report in writing containing information on the source, nature and cause of the discharge, the date and time of the discharge, the approximate total vinyl chloride loss during the discharge, the method used for determining the vinyl chloride loss, the action that was taken to

prevent the discharge, and measures adopted to prevent future discharges.

Comment: The malfunction provision in section 61.65(a)(1)(A) is an effort to resolve the "emergency" discharge provision in the current standard. The term "malfunction" is defined in new subsection 61.61(v).

Subsection 61.65(a)(1)(B) is an effort to define a frequency and quantity measurement for acceptable releases.

Subsection 61.65(a)(2) has been amended to exempt discharges of less than 100 pounds from the 10-day reporting required provided that the discharge also meets the frequency requirement of section 61.65(a)(1)(B) of one discharge per 2,000 batches. These small discharges would be listed in the semiannual report. See, section 61.70(c)(4).

§ 61.68

Emission Monitoring.

(c) A daily weekly check is to be conducted for each vinyl chloride monitoring system used. For all of the emission sources listed in paragraph (a) of this section, except the one for which an emission limit is prescribed in § 61.62(b), the daily weekly span check is to be conducted with a concentration of vinyl chloride equal to 10 ppm. For the emission source for which an emission limit is prescribed in § 61.62(b), the daily weekly span check is to be conducted with a concentration of vinyl chloride which is determined to be equivalent to the emission limit for that source based on the emission test required by § 61.67. The calibration is to be done with either:

Comment: A daily check is unnecessary. The benzene standard does not have such a provision.

contractor of the owner or operator of
the stationary source; or

- 6) A malfunction; or
- 7) ~~6~~ Any one, or a combination of the above
circumstances ~~paragraph~~; or
- 8) Other factors determined by the Assis-
tant Secretary;

shall be presumed to be an emergency emission, unless
the Assistant Secretary, in light of all available
relevant facts and circumstances, determines otherwise.
These presumptions shall also apply to discharges
under sections 77.5(a)(3) and 77.6(a).

Subpart B Emission Standards for Vinyl Chloride

77.2 Definitions.

- (w) "Measures"--an adequate combination of design, procedure and equipment to prevent discharges which is approved by the Assistant Secretary and which may be revised by the Assistant Secretary as new information becomes available.
- (x) "Emergency discharge"--in evaluating whether a relief valve or a manual vent valve discharge is an emergency discharge, the presumptions in Section 76.2 apply.