

VINYL INSTITUTE
HEALTH, SAFETY & ENVIRONMENTAL COMMITTEE

NASHVILLE, TN

January 25, 1989

ROUGH DRAFT

Gabe Lefebvre - BFGoodrich
W. C. Holbrook - BFGoodrich
Bob Dubre - Dow Chemical

HRS and NCP - combined rule making now.
HRS is now Appendix "A" to NCP

SPI - Siding, Window, Door group meeting is in Maui!!

Joe Ledvina - Vista
Jim - caustic, OXY, environmental
Irv Power - OXY
John Bapr is now consulting in Sao Paulo.

CMA has outside council to work on comments

Thrust is to clean up sites to background levels regardless if a threat to public health exists.

HRS comments little data available from EPA.

On site land fills ?
Surface impoundments ?

BFG has superfund stie on NPL. Dow may have.

Suggest go through (10 pages) scoring sheets (worksheets about 100 pages) for each plant site.
When rule is finalized by February 21. Exposure through data ways of toxic. Air surface water. Ground water on site exposure.

Default values if no data is available on chemicals/quantities are uncertain.

Old sites scored. If > 28.5. got on list. Sites added to list if > 28.5. now 700+ on list. Only new sites will be stored from CERCLA list. New mechanisms developed in toxicological field.

- a) Mass transfer breathing zone one meter high for ^{fishing} flushing on polluted lake.
- b) Dermal transfer for swimming in water.

Telephone survey 1987 maybe by VERSAR on pits, ponds, lagoons.

Cannot have enough data on sites. Contractors who score sites for EPA may be unaware or may not know to ask which may help lower your score. (rather than use of default values).

CTL016248

Chris: Whole board "blessed" seminar, but not overwhelmingly.

Do one. assess the success of the first.
Develop attendance cut off: if not enough interest - cancel.
1st self funded.

Any limitations on non Vinyl Institute plants? VI member
companies OK. So other non PVC/VCM plants of VI companies could
come.

***Discuss with CAG about Rod and supervisors attending (maint. and
production). Overnight.

Literature available date _____
As a pamphlet (cover letter)

Comment: Don't think 1st session will be for first-line supervisors
since it is first session. Plant management will be conservative and
wait for evaluation of program.

Biography by February 3. of panel members.

Lead panel member. Present their companies' procedure. Other panel
members discuss differences.

DOW has made major shift from safety belts to safety harnesses.

Frank - Q on literature.

**Call PPG - Clark Graybill

TCLF Update:

1. Supposed to be finalized no earlier than June.
(200 PPB) (0.2 PPM) Regulatory for VCM. Not 50 PPB as last
thought.

Waste impoundments - more time but nothing special (ie: same
rules)

Calculated as conc. of VCM in water going into pond.

Generic dilution attenuation factor of 100
Health based 2PPB

Surf impound. Put into system for RCRA Part B

Gabe (216)447-7978

BFG went to tanks.

Liner not good enough unless RCRA type liner, which no one likely has.

CTL016249

VCM standard update:

EPA is supposed to make ammendments consistent with VI agreement, but November 28, 1988. "EPS has begun drafting". Peter de LaCruz

Benzene standard rewrite is part of this.

EPA presentation on storm water discharges under NPDES.

SPI committees that don't have Vinyl Institute interests at heart. "OHEIC" committee. Meredith will go to next meeting.

SARA

"Bagging" the plant to determine fugitive emissions contractor "team". DuPont described method.

Reporting Leaks

Flare-stack (non-vinyl) CS₂, HS
State permit: monitored
Federally permitted - but reported to SARA
Got attention from EPA

Immediately reported to state agency. Reported to LEPC later
Others do not report leaks (VCM > 1 lb). NESHAP reporting.

May 8th and 9th:

- Committee meeting (8)
- Board meeting (9)
- Calaway Gardens (Atlanta, GA)
- Annual meeting.

Relief Discharge 61.65A. Don't report to NRC. However, notify CAER, LEPC.

Leaks not reportable because federally permitted under NESHAPS

5% vinyl reported since not Federally permitted.
(Not in vinyl chloride service) > 1 PPM.
Some use 100 lbs. as reporting trigger. BFG considering to report.

Item 8

OSHA Performance Award

- to consider contract employees, not construction employees.
- Dow doesn't want this because of considering of who is "employer"
- Keep last year's method (look for change next year)

VI Safety Award

- nomination sent out.

CTL016250

REVIEW DATA - MARCH 1

Lawsuits: Dow's flare - Dow lost.

Frank - Georgia Gulf

Legislation: Texas: Prohibit sale and manufacturing of plastic 8-pack
toos.

2nd tier toxic chemicals
CMA is doing comments

Next meeting: Probably held in conjunction with VCSA meeting
September 28 and 29.

Lead
Cadmium
Concerns in solid waste

CTL016251

Rough
draft

1-25-89

VINYL INSTITUTE

HEALTH SAFETY & ENVIRONMENTAL COMMITTEE

NASHVILLE, TN

BASE LAYERS

WATER TREATMENT

SOB OJAS

GPSE
LEFEBVRE
BFG

HRS
NCP } COMBINED RISK MAKING
NOW

HRS IS NOW APPENDIX A TO NCP

SPI

SIDING, WINDOW, DOOR

GROUP MEETING IS IN MAINT.

JOE LEDVINA

~~Jm~~ ~~CAUTION~~ ~~EXPERIMENT~~

IRV POWER OX

CMA HAS OUTSIDE COUNCIL TO WORK ON COMMENTS JOHN BARR IS NOW
CONSULTING IN SIO
FAR

THRUST IS TO CLEANUP SITE TO BACKGROUND LEVELS REPEATEDLY

IF A THREAT TO PUBLIC HEALTH EXISTS

HRS COMMENTS LITTLE DATA AVAILABLE FROM EPA

ON SITE LAND FILLS

SURFACE & FUNDAMENTS?

BFG HAS SUPERFUND SITE

ON NPL

DOW MAY HAVE

(10 PAGES) → (WORKSHEETS ABOUT 100 PAGES)

SUGGEST GO THROUGH SCORING SHEETS FOR EACH PLANT SITE

WHEN RULE

IS FINALIZED

BY

FEBRUARY 21

EXPOSURE THAN PATHWAYS OF TOXIC

AIR SURFACE WATER
GROUND WATER

ON SITE EXPOSURE

DEFAULT VALUES IF NO DATA IS AVAILABLE ON

CHEMICALS/QUANTITIES ARE UN CERTAIN

CTL016252

OLD SITES SEARCHED. IF > 28.5 GOT ON LIST

SITES ADDED TO LIST IF > 23.5 NOW 700+ ON LIST

ONLY NEW SITES WITH ^{GC} SEARCHED FROM CEP-LA LIST

NEW MECHANISMS DEVELOPED IN TOXICOLOGICAL FIELD

- a) MATTER TRANSFER BREATHING ZONE 1 meter HIGH FOR FISHING ON POLLUTED LAKE
- b) DERMAL TRANSFER FOR SWIMMING IN WATER

TELEPHONE SURVEY 1987 MAY 30 BY VERSAR
ON PITS, PONDS, LAGOONS

CANNOT HAVE ENOUGH DATA ON SITES

CONTRACTORS WHO SCORE SITES ^{FOR EPA} MAY BE UNAWARE

OR MAY NOT KNOW TO ASK WHICH MAY HELP

LOWER YOUR SCORE (RATHER THAN USE OF DEFAULT VALUES)

CHRIS

WHOSE BOARD "BLESSES" SUMMER
BUT NOT OVERWHELMINGLY

DO ONE, ASSESS THE SUCCESS OF THE FIRST

DEVELOP ATTENDANCE CUT OFF; IF NOT ENOUGH INTEREST - CANCEL

1ST SELF FINDED

*

DISCUSS
W/CAG.

ABOUT
200 SUPERVISORS
ATTENDING
(MAINT & PRODUCTION)
NINETEEN

ANY LIMITATION ON NON VINYL INSTITUTE PLANTS?

VI MEMBER COMPANIES OK SO OTHER NON PVC/VIN
PLANTS OF VI COMPANIES

CTL016253

COULD COME

LITERATURE AVAILABLE DATE _____

AS A PAPER - OVERVIEW

comment

DON'T THINK 1st SESSION WILL BE FOR THE NE SHAD
SINCE IT IS 1st SESSION PLANT THAT WILL BE
CONSERVATIVE AND WAIT FOR EVALUATION OF PROGRAM.

BIOGRAPHY BY FEB 3 OF PANEL MEMBERS

LEAD PANEL MEMBERS PRESENT THEIR COMPANY'S PROCEDURE
OTHER PANEL MEMBERS DISCUSS DIFFERENCES

DJW HAS MADE MAJOR SHIFT FROM SAFETY BELT
TO SAFETY HARNESS

*
ALP
CLARK GRAYBILL

FRANK - Q ON LITERATURE

TCLP UPDATE

1) ... SUPPOSED TO BE FINALIZED NO EARLIER THAN JUNE
(200 PPB) (0.2 PPB) REGULATORY FOR VCM
NOT 50^{PPB} AS LAST THOUGHT

WASTE 1 POUND NON-AS - MORE TIME BUT NOTHING
SPECIAL i.e. SAME RULES
CALCULATED AS ^{COMING OF VCM IN} WATER GOING INTO POND

GENERIC DILUTION ATTENUATION ^{FACTOR OF} 100
HEALTH BASED 2 PPB

CTL016254

SURF LANDING PUTTING SYSTEM
FOR RCRA PART B

(216) 417-

CASE 7978

BFG WENT TO TANKS

LINER NOT GOOD ENOUGH UNLESS RCRA TYPE LINER
WHICH NO ONE LIKELY HAS

VCM STD. UPDATE

EPA IS SUPPOSED TO MAKE AMENDMENTS
CONSISTANT WITH VI AGREEMENT BUT

NOV 28, 1988 "EPA HAS BEGUN DRAFTING"

PETER DE LA CRUZ

BENZENE STANDARD ~~BE REWRITTEN~~ REWRITE IS
PART OF THIS

EPA PRESENTATION ON STORM WATER DISCHARGES
UNDER NPDES

SPI COMMITTEES THAT DON'T HAVE VINYL INSTITUTE
INTERESTS AT HEART "OHEIC" COMMITTEE
MERIDITH WILL GO TO NEXT MEETING

SARA

THE PLANT
BIDDING TO DETERMINE POSITIVE EMISSIONS
CONTRACTOR "TEAM"
DU PONT DESCRIBED METHOD

REPORTING LEAKS

FLARE STACK (NON-VINYL) CS_2, H_2S

STATE PERMIT; MONITORED

FEDERALLY PERMITTED - BUT REPORTED TO SARA

GOT ATTENTION FROM EPA

MM 8,9

COMMITTEE MEETING (8)

BOND MEETING (9)

CALAWAY GROUPS
(ATLANTA GA)

ANNUAL MEETING

IMMEDIATELY REPORTED

TO STATE AGENCY.

REPORTED TO LEPC LATER

OTHERS DO NOT REPORT LEAKS (VOLUME > 1 LB)

NEHAAP REPORTING

RELIEF GROUP DON'T REPORT TO NRC

DISCHARGE

NOTIFY CAER, LEPC HOWEVER

~~LEAKS~~ NOT REPORTABLE BECAUSE FED PERMITTED
UNDER NEHAAP

5% VINYL REPORTED SINCE NOT FEDERAL PERMITTED

(NOT IN VINYL CHLORIDE SERVICE) 71 PPM

SOME USE 100 LBS AS REPORTING TRIGGER
BFG CONSIDERING TO REPORT

ITEM 3

OSHA PERFORMANCE AWARD

TO CONSIDER CONTRACT EMPLOYEES

NOT CONSTRUCTION EMPLOYEES

DOW DOESN'T WANT THIS BECAUSE OF
CONSIDERING OF WHO IS "EMPLOYER"

KEEP LAST YEAR'S METHOD

LOOK FOR CHANGE NEXT YEAR

VI SAFETY AWARD

NOMINATION PACK SENT OUT

LAWSUITS DOW'S CASE - DOW LOST

FRANK - GEORGIA
GUR

LEGISLATION TEXAS: PROHIBIT SALE AND MFG OF
PLASTIC & PACK TOPS

2ND TIER TOXIC CHEMICALS

CMA IS DOING COMMENTS

NEXT MEETING

PROBABLY HELD IN

~~WASH~~ CONJUNCTION MEETING USA

CTL016257

28.29 SEPTEMBER

REVIEW
DATE
MARCH 1

SOUTH
WEST
AIRPORT

LEAD
CADMIUM
CONCENTRATIONS
SOLID WASTE

CTL016258