



August 8, 1986

TO: Vinyl Institute Health, Safety and Environment Committee

RE: TCLP Task Force Meeting

On August 6 the Committee's TCLP Task Force charied by Joe King met to begin developing VI comments on EPA's proposed Toxicity Characteristic Leaching Proposal and hazardous waste listing proposal (51 FR 21648 - 93; June 13, 1986). Attached is a "rough" outline produced at the meeting of areas to be covered. Individuals assigned to specific areas are noted.

The timing we agreed to is as follows:

1. Draft of all agreed to assignments to P. de la Cruz and M. Scheck by August 22.
2. Initial draft of VI response document from de la Cruz to Committee members by August 29.
3. Comments on draft VI response document (Item 2 above) to de la Cruz by September 9.
4. September 11 was set aside as a possible meeting date for the TCLP Task Force should one be determined to be necessary.

This schedule should give us an additional two weeks prior to the comment period deadline of September 26.

Meredith N. Scheck
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cc: J.C. Lunn, Borden
B. Galshon, Georgia Gulf

PLEASE NOTE: It is currently planned that our comments will be part of comments filed on behalf of SPI. If this should change, I will advise you.

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TCLP Task Force: Areas to be Covered in Comments Due to EPA 9/26/86

<u>Assignment</u>	<u>Areas of Comment</u>
de la Cruz	<u>Statutory Issues</u> -Review of Subsections 301 (g) and (h), both statutory language and legislative history. -Discussion of timetables included in statute -Comparison of above with EPA action -Discussion of linkage with land ban proposal -Discussion of Mismanagement
King (Source: Barr draft)	<u>Timing</u> -No sufficient time to characterize waste and products prior to extended deadline; no allowance for time to check reproducibility -Discussion of Science Advisory Board Recommendations -Discussion of what constitutes "representative" sample -Insufficient time to develop appropriate compliance programs -Discussion of 6 month "interim status"; 2 years for Part B to apply.
King (Source: Barr & CMA drafts)	<u>Cost/Regulatory Impact</u> -EPA has not made cost study -Inappropriate scenario: no analysis of costs and related benefits -Expanded to large number of facilities -Mismanagement scenario is inappropriate -Include reference to number of those affected -- both PVC processors (Scheck to try to get) and POTWs. -Discussion of permitting costs and related financial assurance requirements -Health Benefits: Risk Assessment fails to recognize human experience
Barr (Source: EPA's Municipal Sludge Exclusion)	<u>Groundwater Migration Model</u> -Definition of Mismanagement -Assumes failure of system/leaching -Assumes Lifetime sole source water use -Assumes health effect from vinyl chloride -Discussion of Infinite Source -Discussion of why a generic model cannot be used -Discussion of BDAT (Best Demonstrated Available Technology) and what companies are currently doing with stripping tech. -Discussion of EPA Model vis-a-vis what is maximum available to be produced at PVC facility -Development of scenario of wastewater coming out of plants

Barr
(Source: EPA
Contractor
Document for
CAG on RQ)

Basis for Choosing VC Level

- Do not use MCL
- No public health threat
- No plausible upper limit
- RQ on VC is one pound
- Other regulations of VC

Ledvina

Wastewater

- Expand on items in #3 including number of facilities to be regulated
- Discussion of concentration of what is in the outfall of the pond, not what is coming in or use of average of pond concentration
- Discussion of HSWA 3005 (j) Surface Impoundments

de la Cruz

Conclusions & Recommendations

To be developed following receipt of assignments.