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December 6, 1982

RECEIVED

DEC 14 1982
R. W. L. BUREAU

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ACCORDINGLY.

TO: SPI PVC Safety Group
SPI PVC Manufacturing Technology Committee
SPI PVC Health Committee
SPI PVC Communications Committee
SPI PVC Lawyers Subcommittee

Re: Emergency Relief Valve and Related Discharges

Ladies and Gentlemen:

In our letter of October 4, 1982, we provided monthly discharge data for the first half of 1982. Since that time, we have received additional information which has allowed us to substantially supplement these figures. For example, the earlier reports for discharge data reflected approximately 55% of industry capacity. The revised report reflects approximately 76% of industry capacity.

A comparison of the revised data with the prior report shows a decrease in the average number of releases per month and the average number of pounds released per month when these figures are projected to 100% of industry capacity. Similarly, the average number of pounds per release also decreased with the additional data.

We certainly appreciate your continuing participation with this program. It has proven particularly helpful in recent discussions with the Environmental Protection Agency (EPA) concerning potential changes to the vinyl chloride standard.

We expect to have a report covering calendar 1982 ready for distribution in March, 1983. The delay in preparing the reports is usually attributable to the time necessary to receive

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TABLE A -- DISCHARGE DATA FOR PVC INDUSTRY
(Based on Industry Capacity Varying Between 8459 and 9000 MM lb.)

	<u>1/82</u>	<u>2/82</u>	<u>3/82</u>	<u>4/82</u>	<u>5/82</u>	<u>6/82</u>
% of Industry Capacity	78.2	77.9	76.1	76.0	76.0	76.0
Number of Releases						
R	6.0	1.0	2.0	5.0	8.0	4.0
NR	<u>2.0</u>	<u>2.0</u>	<u>2.0</u>	<u>3.0</u>	---	<u>2.0</u>
TOTAL	8.0	3.0	4.0	8.0	8.0	6.0
OP	1.0	1.0	2.0	1.5	3.0	1.0
ME	1.0	2.0	1.0	4.5	2.0	3.0
EL	0.5	---	---	---	---	---
IN	0.5	---	1.0	1.0	1.0	1.0
PU	1.0	---	---	---	1.0	1.0
OT	4.0	---	---	1.0	1.0	---
UN	---	---	---	---	---	---
TOTAL	8.0	3.0	4.0	8.0	8.0	6.0
Average Number of Releases per Month	10.2*	3.9*	5.3*	10.5*	10.5*	7.9*
Number of Pounds Released	15,863.0	3,291.0	2,875.0	4,022.0	21,206.0+	2,393.0
Average Number of Pounds Released Per Month	20,285.2 *	4,224.6 *	3,777.9 *	5,292.1 *	27,902.6 *	3,148.7 *
Average Number of Pounds Per Release	1,555.2	843.8	542.5	383.0	2,019.6	302.9

KEY TO ABBREVIATIONS:

R = Reactor
NR = Non-reactor (other equipment)
OP = Operator error
ME = Mechanical failure
EL = Electrical failure
IN = Instrument failure
PU = Process failure
OT = Other
UN = Unknown

* = Projected to 100% of the Industry Capacity

+ = Includes one release of 12,090 lbs. from a PVC reactor due to instrument failure.

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TABLE B -- DISCHARGE DATA FOR PVC INDUSTRY

As a Function of lb. Production

(Based on Industry Capacity Varying Between 8459 and 9000 MM lb.)+

	<u>1/82</u>	<u>2/82</u>	<u>3/82</u>	<u>4/82</u>	<u>5/82</u>	<u>6/82</u>
% of Industry Capacity	65.1	63.6	62.6	61.7	61.7	61.7
Number of Releases	7.0	2.0	3.0	5.0	7.0	4.0
Number of Pounds Released	15,474.0	3,041.0	2,315.0	3,044.0	9,124.0	2,107.0
Production in Millions of Pounds	231.5	286.6	318.7	313.0	335.0	339.3
Pounds Released Per Million Pounds of Production	66.8	10.6	7.3	9.7	27.2	6.2
Number of Releases Per Million Pounds of Production	0.03	0.007	0.009	0.02	0.02	0.01

+ Responses to Freedom of Information requests for discharge data do not show pound production. This accounts for the differences between Table A and Table B.

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TABLE C -- DISCHARGE DATA FOR PVC INDUSTRY

As a Function of Batch Production

Based on Industry Capacity Varying Between 8459 and 9000 MM lb.)+

	<u>1/82</u>	<u>2/82</u>	<u>3/82</u>	<u>4/82</u>	<u>5/82</u>	<u>6/82</u>
% of Industry	60.9	57.3	58.2	57.2	55.0	57.2
Number of Releases	7.0	2.0	3.0	5.0	7.0	2.0
Number of Pounds Released	15,474.0	3,041.0	2,315.0	3,044.0	9,124.0	57.0
Production in Batches	18,157.0	19,322.0	21,459.0	21,856.0	23,740.0	24,757.0
Pounds Released Per Batch	0.9	0.2	0.1	0.1	0.4	0.002
Number of Releases Per 1,000 Batches	0.4	0.1	0.1	0.2	0.3	0.08

+ Responses to Freedom of Information Act requests for discharge data do not show batch production. Some monthly reports by members do not indicate batch production because of the manufacturing process. This accounts for the differences between Tables A, B and C.

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TABLE D
DISCHARGE DATA FOR PVC INDUSTRY
BY SIZE OF DISCHARGE

January 1, 1982 - June 30, 1982

<u>Size of Discharge in Pounds</u>	<u>Number of Discharges</u>
1 to 50	7
Over 50 to 100	6
Over 100 to 500	8
Over 500 to 1,000	3
Over 1,000 to 5,000	11
Over 5,000 to 10,000	1
Over 10,000	1
TOTAL	37

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