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Subject VINYL INSTITUTE - HEALTH, SAFETY, AND ENVIRONMENT SUB COMMITTEE MEETING - JANUARY 1990			Date MARCH 13, 1990	

LAND DISPOSAL RESTRICTIONS FOR FO 24 WASTES

VCM manufacture produces wastes that can or do contain Dioxins. Land disposal will soon be prohibited and waste incineration companies will not take the waste because they would then have to test their incinerator output for Dioxins (limit 1 ppb). Measurable Levels of Dioxins can be found in almost all incinerators, including municipal solid waste incinerators and home fireplaces. Some companies (Vista & PFG) are storing 55 gal. drums of waste offsite (at \$800/drum); others do not classify waste as FO 24 but have total recycle sewer systems for heat exchanger bundle hydroblast cleaning.

A "letter of interpretation" has been sent to USEPA to clarify if wastewater is included in the standard; no reply yet. The VI will send a questionnaire to VCM producers asking for their classification for various categories of process wastes so a united front can be presented in further discussions with USEPA.

HEALTH, SAFETY AND ENVIRONMENT COMMITTEE

Topics of major importance discussed at the committee meeting were as follows:

Recycling

Fearing that someday manufacturers will face a "hazardous" classification for PVC waste and desire to generate some "good press" were the reasons to discuss the possibility of recycling PVC solid waste such as wall scrapping, floor spills, scrap compound, etc. OXY stated they do not produce any PVC waste. Others spoke of the legal implications and technology confidentiality ("clean wall" technology). Several companies have long term relationships with customers who buy wall scrappings. Results - very little interest in an industry sponsored PVC recycling project.

Disposal of initiator bottles seemed to be a universal problem. Since initiator manufacturers are already involved with the VI, a letter requesting a meeting on the issue at the annual meeting will be sent. This will exert some industry wide pressure to lessen the disposal burden.

Enforcement Actions

CTL016104

OXY manway leak. An incorrect pressure test by an operator charging a reactor resulted in the loss of 15,000 lbs. VCM. Texas Air Quality Board wanted to issue a massive fine but this leak was not a NESHA violation.

Enforcement Actions (continued)

Fenceline monitoring. A condition imposed by the state for a permit renewal at Pensacola requires daily monitoring at 3 fenceline locations for 6 months. The cost will be \$90 - \$100 thousand.

BFG in LA had one day with weighted average RVCM exceedance and one relief valve discharge of less than 100 lbs. LADEQ fine proposal was \$10,000.

Vista in LA had 8 incidents of bypasses or releases of VCM. They paid a \$9000. fine to LADEQ.

Other topics covered were:

VCM in landfills is the topic of a technical information paper now in technical/legal review discounting PVC as a source of VCM.

A Dutch study implicating VCM plants as a source of Dioxin/furan contamination of river sediment is causing BFG to plan to sample plant effluent. PPG sampled in 1987 and found nothing.

SARA 313 fugitive emission factors were reduced at a PVC plant that contracted a "bagging" study (\$60,000). Consensus was to continue to use USEPA published emission factors.

Rail shipments of VCM along the East Coast was a holdover topic from the Boston meeting. A meeting will be held with Conrail and Conrail's emergency response contractors in February. OXY is training a response team in Pottstown. Questions of shared responsibility for a response were discussed. This should be an appropriate topic for the VCSA.

New Jersey labeling law for products containing "hazardous" ingredients apparently does not apply to articles which do not change form such as siding or pipe.

A call was made for the VI to get involved in Louisiana's water quality regulations. It was felt that LCA was not doing enough.

Discussion of the new Clean Air Act focused on regulations for HCl emissions from incinerators, both from a manufacturing and a plastic trash incineration view. The provisions allowing USEPA to ban products or ingredients in products was alarming to W.C. Holbrook.

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