

agenda



VINYL INSTITUTE HEALTH, SAFETY & ENVIRONMENT COMMITTEE

Orlando Marriott
8001 International Drive
Orlando, Florida
407/351-2420

Tuesday
January 23, 1990
9 am

- | | |
|--|-------------------|
| I. Opening of Meeting and Self-Introductions | Group |
| II. Approval of Minutes of September 27, 1989 | Group |
| III. Dutch Study on PCDD's PCDF's from the
Oxychlorination Process (Will be sent in mail
with mail copy of Agenda) | Holbrook |
| IV. FO24 Subcommittee Report/Strategy | Lewis |
| V. Fugitive Emission Follow UP | Group |
| VI. Waste Minimization Task Force | Ledvina |
| VII. SARA 313 Report and Zero Discharge Goal | Scheck &
Group |
| VIII. Activity on East Coast Rail Safety | Borrelli |
| IX. New Jersey Labeling Update | Group |
| X. Louisiana Water Regulations | Borrelli |
| XI. NESHAPS - inprocess wastewater (40CFR61.65 (b)(9)(i)
as it applies to VCM/EDC plants | Ledvina |
| XII. VI Annual Safety Award and VI Environmental and
Safety Recognition | Scheck |
| XIII. Enforcement Update | Group |
| IX. Request from Occidental - test data on resin/
leachates (letter of request being sent under separate
cover) | Group |
| XV. New Business | |
| XVI. Next Meeting | |
- Senate Bill 1630
EDC soil & GW cleanup.*

VVV 000026517

VI Health, Safety, & Env. ; Orlando 1/23/90

1. Vinyl Std. Revisions - Jeff Lange K&H

How: VI commented on the proposal
EPA expects to finalize as proposed.

2. EDC OSHA litigation - agreement in Aug.

OK to use respirators; ~~the~~

3. UCM Reduction in ground from anaerobic degradation - VI doing a white paper.

4. Dutch Study on PCDD & PCDFs - BFG is

looking for dioxins and furans in some
(water)
internal streams and wastewaters.

PPG has sampled wastewater for a state permit
application two years ago and found nothing.

Dutch study says Oxy with Cu catalyst
at 250-300°C is the crucial step to
form dioxins & furans.

Should we look for dioxins and furans
in: letters.

Get copies of the report. (VI)

5. F024 Subcommittee Report

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a) Dow, Vison, BFG, Certaintek, Co-Gulf.

London, PPG, Oxy - not represented.

4 Will send out a questionnaire to producers

4 BFG says they do not have F024 wastes.

d) // waste stream! will take pressure to
that: code and way.

e) BFC soap no free radicals ~~actions~~ ^{catalyzed} reactions.
f) BFC soap may have initiated reactions not catalyzed
actions.

g) Geo Guy has reaction time they call as FOY
This is probably 110179/11010.

A) How hard to call their case as FOY but
are changing their designation to something else.
Based on an analysis of the waste. How is
apparently looking at dioxins in case. They
found very little and in that ratio are
calling the waste non-FOY.

i) If long will call EPA what they think of
the FOY and -and comments.

6. Fugitives - (a) Europeans develop their own factors;
no ~~not~~ joint effort to develop emission factors.
(b) How ^{from opening} estimate fugitive emissions for 5/3
reporting
VVV 000026519

(c) Gooden reduction at MC plants is up to 50% of fug.
emissions

d).

7. Frank Bonelli has EDC & ³¹³VCU Data ~~2~~
for 1988. Will share with VI. Looking at the
data, this report appears to be from 198
Meredith handed out the latest summary of
1988 emissions data.

8. Waste Minimization -

Oxy thinks we shouldn't do a joint
effort due to legal concerns. Oxy Votes No.

Shintech doesn't want to do this.

Air Products - NO feed back.

BFG - Still interested in pursuing
something.

Go Gulf - NO feed back.

Put on the agenda for next time; no further action
on resin/composed waste/.

- ★ 9. ICL: Write note on solvent containers to
HSE members ask them to understand
their situation. Meet with suppliers at
next HSE mtg.

10. East Coast Rail Safety - (not a VI activity)
(Outside)

BF6, Oxy, Co-Gulf Formula have got together
to discuss since they have PVC plants on the East Coast.

Aug. 89, VW car in Camden lost a lot of VW through a puncture; no ~~notice~~ obvious problems.

Group has met twice; next mtg in Feb.

Consoil will be at a meeting. 2/15/16. Day
Dm
1/1/16. W. N.T.

Qry is putting together a response team ^{side}
in Pittsbn.

ECRS will work with CWA (Chemtree)
How does this activity fit into Chemnet?

11. NT Labelling Update-

~~1~~ Oxy- Thinks packages going into NF needs to be labelled.

B7C- Gobe LeBeure soap labels need to be put on pkg. going into the state.

Oxy. ~~Feed~~ Kanzen - Berl. So. ^(LOS) 386-9100

BFG - Gold

UNTA - TCG.

6c Gulf - Froule forrelli.

Shirteah - Dennis Dodgen -

Set up
conference
call.

12. La. Water Regs. - BFG 2' Oxy soap no; don't get involved with an overall program with LCA or separately as VI.
 Work thru LCA as individual companies.
 not as VI in La

13. Awards - numbers due 3/1.
 Safety Award by 2/15.

14. Wastewater -

Don't soap
 you can strip
 before stripping

Doc - assumed the "piece" of equipment is the stripper & that the Oppur applies to stripped water out of the stripper.

BFG - Strips separately. Region IV told them to do this.

PPG - Two strippers; above & below Oppur.
 LA's policy seems to be that separate stripping is required.
 Has 7 strippers total.

Ga-Gulf - Frank Thinks they segregate.

Check preamble to regulation. ~~the~~
 WC soap the preamble speaks to this issue.

15. ~~Enforcement~~ - Jim K, Oxy.

Improper gasket installation
Charged \$, but 15,000 hrs VCM.

Oxy called it a leak.

TACB said they were going to call it
a violation, but after reconsideration,
TACB agreed it was not a violation.

Air Products - Paul U. ^{State of Florida}

Pensacola; required to do 6 months
of ambient fence-line monitoring.

7 day composites (15 min/hr.)

Using Sema Counters (232) to collect.

\$90-100M

3 sites on the fence-line
selected because of neighborhood proximity
permit renewal; no modifications.

Contractor will do a turnkey job.
Starting mid Feb.

Skintech. - Is having discussions with TACB about
similar monitoring over PSD permit.

CertainTech - Lake Charles monitoring stations.

7 stations; Radon; 150 chemicals
being looked for.

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BFG, La - Received NOV for ^{DEP} ^{ROC} RCM exceedance and
1 RV. Asked for \$10,000; not settled yet.

PPG - Compliance order ^{DEP} 3/89 to sample & analyze sediments in the canal & to fund a study of the estuary and find out where the problem is.

Consent agreement in July; DEP pulled out of the agreement in August.

Bypass 3700' of Canal

Dry up canal & remediate.

12% organics in wet basis; mostly EDC.

< 100 ppm organics in bays & ducts.

Some in the ship channel.

Eng. Science has done a study for PPG on the sources of HCB; many other historical uses of HCB.

PPG - Got a 308 compliance letter

asking for biomonitoring EDC, HCB, HCB, tetro.

Got AO on Cu violations; expect a fine of about \$100M.

AO in Dec on Chlorinated hydrocarbons.

PPG applied for a fundamentally different factor (FOF) variance; stripper; tentatively denied. (chloroform) forming in strippers).

16. Oxy- NJ Landfill.

DFB sent ~~out~~ in some data.

17. Senate Bill 1630 - Municipal Waste Combustion
Section 306

CMA will develop comments on combustion section.

K&H Brainstein what to do about about these sections.

Meredith to talk to Dick McGee about any technical problems with incinerators.

Meredith will talk to Bob Elcik of Oxy & CSWS to alert them of the possible impact on PVC, AB, CD.

18. EDC & Groundwater - Next meetings agenda.
Case histories (15 min per speaker)

19. PP6 wants to know if we are interested in discussing engineering controls on EDC?
Clark Graybill will send out a note.

20. Next mtg; 5/10

11/24/90. VI/ES10/BFG - Orlando

Kathy Soudan & Exxon Canada
Bruce Jones

John Stelling Radon

Jeff Long - R&H

Meredith Schmale

John Yarn - Skintech

Ken Lewis - BFG

Leo Schum-Dow

1. BFG is expanding its Niagara Falls, Ont. plant. Ontario has required a Level 1 study. (BACT, LAER).

Esso also has expansion plans and will be required to do a study.

2. Esso has hired Corner Assoc. to assist. BFG has hired Radon. (Lawrence Curtis).

3. As of July 88, need a construction permit. Not well advertised

4. Level 1 contaminants include VOCs, benzene

5. Ontario will set 3 micrograms/m³ ^{hw.} 1/2 average ambient std.
0.06 ppb annually. ($\sim 2 \mu\text{g}/\text{m}^3$)

6. Required to meet LAER and ambient stds.

Compliance measured by ~~model~~ modelling.

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7. Fugitives not in the models. required of ESSC
BTE had to include.
8. BTE would have met 3ug/m³ if it wasn't for
fugitives.
9. 1/100 ACGIH (ppm) short term Texas ambient
1/1000 " long " guideline
10. John Yang says that if you have a PSD permit
on a plant and want to modify the plant
even a minor amount, the PSD permit needs to
be reviewed.
11. Dow does no fence line monitoring
12. Cherry Residential Canada 200 ppm.
Australia 100 ppm.
13. Intertek has 137 fixed points; 10 GC's
They pull samples thru a canister for 7 1/2 min
so the sample point analysis is an
average of 7 1/2 min, then analyze,
then purge. and go thru another cycle.
14. Goodrich doesn't operator vent gas incinerators
at PVC plants. They use them as back-up to vent
gas absorbers. The incinerators are not kept hot. VVV 000026527

15. Goodrich does not use gas holders in their recovery system. Skintech & Oxy (Prochem) do have gas holders. Seal water at gas holders contains significant amounts of

* 16. Hardness in groundwater. Calcium fouling steam stripping. (BFG)

* 17. Chlorobenzene formation in steamers; Mr. running acidic. Does acid keep hardness from being a problem.

18. Some people incinerate vents off blend tanks.

19. Skintech sends blend tank vents back to a recovery system gas holder; no vent to atm.

20. Ontario is trying to get ESSO to incinerate blend tank vents.

21. ESSO & BFG will share their Level 1 Studies with the VI.

22. ESSO trying to complete end of Feb. BFG doesn't have a schedule yet.