

Copy to Bruce
1-15-90



IMPORTANT

A Division of The Society of The Plastics Industry, Inc.

Jan. 9, 1990

TO: Health Safety & Environment Committee

RE: Janaury 22, 23 and 24 Meetings

The Agenda for the Health, Safety & Environment Committee meeting for Janaury 23, 1990 is attached. As previously notified, this meeting will be at the:

Orlando Marriott Hotel
8001 International Drive
Orlando, Florida 32819
(407) 351-2420

TWO IMPORTANT CHANGES HAVE BEEN MADE THAT MAY AFFECT YOUR CALENDAR.

1. **JANUARY 22** - FO 24 Issue

A meeting of the FO 24 Task Force has now been scheduled for Monday, Janaury 22, 1990 beginning at 2 p.m. This meeting will also be at the Orlando Marriott. Comments submitted to EPA by member companies on the Land Disposal Restrictions for Third Scheduled Wastes Proposed Rule note substantial problems exist for those of you that classify any wastes as FO 24.

The Task Force will discuss the issue and develop a strategy on how to proceed with any joint industry activity, such as a meeting with EPA. If this issue is important to your company, please attend or invite the appropriate person to represent your company at this meeting.

Please let me know if you will be attending or sending a representative.

2. **JANUARY 24** - Meeting with Contractors Doing Study for Canadian Ministry of the Environment

At the suggestion of Jim Lewis and W.C. Holbrook of BFGoodrich, and with the agreement of Committee Chairman Frank Borrelli, a special meeting has been scheduled for Wednesday, January 24, beginning at 9 am and running through noon. Many of you have previously been contacted directly by contractors (O'Connor Associates Environmental and Radian) who are carrying out reviews of comparative VCM Emission levels and emission control technologies for vinyl companies that a seeking construction project approval. The purpose of the review is to develop a "Level 1" analysis of "Lowest Achievable Emission Rate (LAER) and "Best Available Control Technology"(BACT).

They have been seeking information on:

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- VCM emission and ambient air standards in various government jurisdictions (including the U.S.)
- VCM emission levels (from PVC plants) that represent existing plant performance
- general control or process strategies/methods that are used to achieve plant emission levels
- Ambient air (or fenceline) VCM levels.

W.C. Holbrook and Jim Lewis have asked that you come to this meeting prepared to discuss the above items in detail.

Specifically, they have asked that you bring with you two copies of your existing permits to share with the company representatives/contractors. If you have any questions about this part of the program, please call either W.C. Holbrook at 216/447/7925 or Jim Lewis at 216/447-7979. I will, of course, also be happy to answer any questions.

Please let me know if you will be attending this meeting.



Meredith N. Scheck
Assistant Director

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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 | |

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BFGoodrich

Copy to Bruce
1-15-90

The BFGoodrich Company
Geon Vinyl Division
6100 Oak Tree Boulevard
Cleveland, Ohio 44131
216-447-6000

December 1, 1989

Ms. Meredith Scheck
The Vinyl Institute
Wayne Interchange Plaza II
155 Route 46 West
Wayne, NJ 07470

Dear Meredith:

It seems appropriate that the attached be sent to the Vinyl Institute Safety, Health and Environmental Committee members prior to our January meeting and this topic be on our meeting agenda.

Sincerely,

THE BFGOODRICH COMPANY
Geon Vinyl Division

W. C. Holbrook

W. C. Holbrook
Director, Environmental Affairs

WCH/kp
DOC403

Attachment.

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ESSENDERLO - BELGIUM

WC
Date : 06/11/1989

In case you did not
receive all pages, please
contact Mia or Lieve
(tel. 013/66.61.12)

*Bob -
What do we
know about
these compounds
in mg*

From : W. BORMANS
Addressee : BFGOODRICH / Cleveland
0012164476172
F.a.o. : Mr. Lee M. PUCKETT
Director of Licensing & International
Manufacturing Support
Pages : 2
(incl. this page)

Dear Lee,

R : PCDD's and PCDF's formation in oxychlorination

Enclosed, all the information we received about the subject,
together with the covering letter.

Quote

"SOU 14

CATALYTIC OXYCHLORINATION PROCESSES OF ALIPHATIC HYDROCARBONS AS
NEW INDUSTRIAL SOURCES OF PCDDs AND PCDFs.
E.H.G. Evers*, M. Buring, M. Slie and H. Govers, Laboratory of
Environmental and Toxicological Chemistry, University of
Amsterdam, Nieuwe Achtergracht 155, 1018 NV Amsterdam, The
Netherlands.

In the last few years extensive sediment and waste water
monitoring studies in the river Rhine area have been performed
with special attention to industrial sources of PCDDs and PCDFs.
From these studies it was concluded that hitherto not
recognized industrial sources contributed significantly to the
pollution of the Dutch river delta with these compounds. The
PCDD/PCDF isomer patterns and spatial variations of their
relative levels indicated vinylchloride monomer (VCM) production
as a principal source for PCDDs and especially PCDFs. Analysis
of process and waste water, sampled at various points in the VCM
production process confirmed these indications. The crucial
step was found to be the oxychlorination of ethylene to 1,2-
dichloroethane catalyzed by alumina-CuCl₂ at 250 - 300°C.

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Addressee : BFGOODRICH / Cl v land
0012164476172
F.a.o. : Mr. Lee M. PUCKETT
Director of Licensing & International
Manufacturing Support

At the laboratory the oxychlorination process and the effect of various reaction parameters (catalyst content and pretreatment, temperature and input gas flows) on the formation of PCDDs, PCDFs and some precursors (polychlorinated biphenyls, -benzenes and -styrenes) was studied.

It was established that transition metal halogenides play a key role in the high temperature formation of the halogenated DDs and DFs and an attempt is made to elucidate the major formation mechanisms.

unquote

Please let us know your comments a.s.a.p.

Kind regards,

W. BORMANS

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ECVM,
250 Avenue Louise,
Box 122,
B 1050 Bruxelles,
Belgien.

att. Mrs. N. Rusotto.

Deres ref.

Deres brev af

Vor ref.

frh

Dato

11. 10. 89

PVC discussion - Denmark.

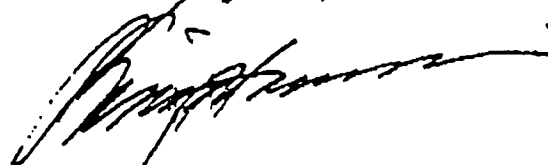
In an abstract from Dioxin 89 (Toronto) reference is made (Sou 14) to a paper by Evers, Buring, Olie and Govers from Laboratory of Environmental and Toxicological Chemistry, University of Amsterdam : " Catalytic Oxychlorination Process of Aliphatic Hydrocarbons as New Industrial Sources of PCDDs and PCDFs ".

Comments contained in this paper are now used by the Danish Environmental Protection Agency as yet an argument against the use of PVC.

I am sure that our industry has already studied the mentioned paper and that comments to its conclusions have been formulated.

To help us in our future discussions with the EPA would you kindly let us have your comments to the enclosed abstract.

Kind regards,



F. Ring Hansen

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