



Interoffice Communication

To D. A. Kuhn - Houston
From J. A. DeBernardi
Date July 22, 1977
Subject Amendments to EPA - VCM Emission Standard

I have reviewed the subject amendments, along with information supplied by you and the S.P.I. related to this matter, and can find very little to add to comments already made about it. It remains inconceivable to me that the amendment action taken by the EPA can be considered anything but a reaction to EDF pressure and threats of legal action, and EPA's fear of court action that would prove their original standard to be an unnecessary action costing the consumer an unwarranted decrease in buying power.

The proposed amendments have no basis in fact or data to support them other than "if a little bit is bad, a smaller amount must be better." The changes suggested and reasoning presented to substantiate them are at best ridiculous and contradictory to real world conditions. Calculations made by PED related to documentation of a need for a standby incinerator clearly show that reasonable people, not pressed by political or Federal pressures of promulgated law, could not find a reason based on people exposure to put in any type of control device. Yet EPA finds it necessary to change a standard which has not yet been fully implemented by industry so that its affect can be measured related to public health.

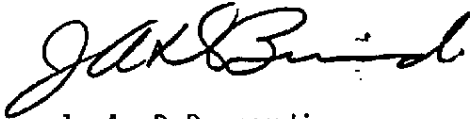
Economic and energy utilization considerations are essentially pushed aside based on old data sweeping statements of operability and available technology obviously not substantiated by fact. The assumption is made that debottlenecking of existing plants to increase production potential will present additional emission potential equal to the building of a new facility. This is, of course, ridiculous.

The proposed offset policy looks at old data related to public exposure but does not recognize the fact emissions at that time were greater than they are now. It sets the offset provision from existing emissions, not from what they were when the data was taken that supposedly prompted the issuance of the original standard. The hazards of transporting VCM to locations separated by 8 KM. versus the almost undetectable increase in ground level concentrations, by pipeline connected plants at the same location, is completely ignored as is the increased potential of fugitive emissions caused by loading operations.

As has already been pointed out in Gary Foshee's letter of July 12, the classification of new source related to oxy units must be clearly defined. An interpretation as a new source in our oxy system caused by a replacement in kind of a damaged reactor, exchanger, or vessel could be very devastating. Similarly, the addition of significant equipment to solve other problems, such as water pollution, cannot be allowed to reclassify our unit as a new source.

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It is my opinion that the requirements related to calibrating and spanning of VCM monitoring equipment on a daily basis is not necessary and should be deleted. Reliability and accuracy of this type of equipment is far greater than daily failure. I believe manufacturers of the equipment would certainly support this position.



J. A. DeBernardi

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