



MEMORANDUM

RECEIVED

JUN 25 '84

Route: JCB

Copy: _____

File: SPI

X-F: _____

TO: Members of the Vinyl Institute
Manufacturing Practices Committee*

June 20, 1984

FROM: Roy T. Gottesman

RE: KPA Enforcement and Review of the
Vinyl Chloride Standard

The enclosed letter and attachments thereto from Peter de la Cruz on the
above subject is provided for your information.

Roy T. Gottesman
Roy T. Gottesman

RTG:jmd
Attachment
B-036

* J. Barr - Air Products & Chemicals
W. C. Holbrook - BFGoodrich
N. Blackman - Borden
W. B. Barton - Borden
J. Ledvina - Conoco Chemicals ✓
R. Oubre - Dow Chemical
J. King - Occidental Chemical
S. Kuis - PPG Industries
J. A. Mullins - Shell Chemical
J. Kachtick - Tenneco Polymers

VEV-239989

A Division of

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

355 LEXINGTON AVENUE • NEW YORK, N.Y. 10017 • (212) 573-9400

RECEIVED

JUN 18 1984

DR. R. I. GOTTESMAN

40 55551

TELECOMER
(202) 296-7662

CABLE ADDRESS "KELMAN"

WRITER'S DIRECT DIAL NUMBER

202/457-1116

LAW OFFICES

KELLER AND HECKMAN

1150 17TH STREET, N.W.

SUITE 1000

WASHINGTON, D.C. 20036

(202) 457-1100

JOSEPH E. KELLER
JEROME H. HECKMAN
CHARLES H. HECKMAN
WILLIAM H. BORGHESANI, JR.
MALCOLM D. MACARTHUR
WAYNE V. BLACK
MARTIN W. SERCOVICI
JOHN S. ELDRED
CAROLE C. HARRIS
MICHAEL F. MORRONE
LARRY S. SOLOMON
JOHN S. DUBSECK
CHRISTINE A. MEAGHER
SHIRLEY S. FUJIMOTO

MARK FOX EVENS
PETER L. MACRUZ
LAWRENCE P. HALPRIN
DEBORAH SHUR TRINKER
C. DOUGLAS JARRETT
EDWARD L. KORWEK
PETER A. SUBSER
SHEILA A. MILLAR
RUSSELL H. FOX
LEE H. WEINER
TIMOTHY BROWN
ILENE RINGEL MELLER
ELLEN F. EPSTEIN

June 15, 1984

Dr. Roy T. Gottesman
Vinyl Institute
The Society of the Plastics
Industry, Inc.
355 Lexington Avenue
New York, New York 10017

Re: EPA Enforcement and Review of the
Vinyl Chloride Standard

Dear Roy:

The Environmental Protection Agency (EPA) staff at Research Triangle Park indicated that a meeting of the National Air Pollution Control Techniques Advisory Committee (NAPTAC) is now scheduled for August 29 and 30, 1984, at the Sheraton University Center at Durham, North Carolina. Review of the Agency's proposed revisions to the Vinyl Chloride Standard are scheduled for August 30. A package of materials detailing the EPA proposal should be distributed in mid-July. Also, a Federal Register notice on this subject should be published in the next month.

The NAPTAC panel, consisting of approximately ten representatives from EPA, industry and citizen groups, will question the EPA staff concerning various features of the proposal. In addition, there will be an opportunity for interested persons, such as the Vinyl Institute, to comment on the proposals.

Earlier this month, Judge Earl Veron issued an opinion in United States v. Conoco, Inc. Among other things, the opinion held that an inadvertent spill of vinyl chloride monomer and a leak from a rupture disc in the incinerator bypass system were fugitive emissions and not subject to the

VEV-239990

Dr. Roy T. Gottesman
June 15, 1984
Page Two

KELLER AND HECKMAN

ten parts per million (ppm) provisions of the Vinyl Chloride Standard. A copy of the opinion as well as an explanatory cover letter from Gary Baise are enclosed.

If you have any comments or questions, or if I can be of any further assistance, please let me know.

Cordially yours,

Peter

Peter L. de la Cruz

Enclosure

cc: L. William Sessions, President, SPI
Gary Baise, Esquire

VEU-239991