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October 25, 1979

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Mr. R. N. Wheeler, Jr.
Union Carbide Corporation
P. O. Box 8004
S. Charleston, W. Virginia 25303

Dear Mr. Wheeler:

Following up on our telephone conversations and John Lawrence's August 7, 1979 letter to Mr. S. M. Weiss of California's South Coast Air Quality Management District (SCAQMD), we are enclosing herewith several copies of the survey results concerning residual vinyl chloride monomer levels in PVC suspension resins for you to give to Mr. Weiss.

As we understand it, Mr. Weiss asked SPI representatives for information about residual vinyl chloride monomer (RVCM) levels in connection with the development of SCAQMD Rule 1005.1, Standards for Vinyl Chloride. Mr. Lawrence, Technical Director of The Society of the Plastics Industry, Inc. (SPI) and SPI's staff representative to the PVC Safety Group, then wrote to Mr. Weiss on August 7, 1979 to inform him that, at that time, such information was not available but that a survey would be conducted to obtain these data for him. Accordingly, we were commissioned to conduct such a survey.

As you are aware, the U. S. Environmental Protection Agency (EPA) has enacted a National Emissions Standard for Vinyl Chloride. 40 C.F.R. §61.60 et seq. (1976). Section 61.64 of that Standard which governs emissions from all PVC plants limits RVCM in PVC resin following the stripper to:

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- (i) 2,000 ppm for polyvinyl chloride dispersion resins, excluding latex resins;
- (ii) 400 ppm for all other polyvinyl chloride resins, including latex resins, averaged separately for each type of resin....40 C.F.R. §61.64(e)(1)(i) and (ii)(1976).

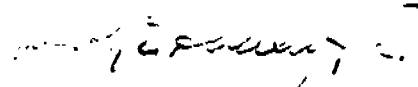
Since this federal EPA Standard also requires that records of RVCM levels at this point in the process must be maintained (40 C.F.R. §61.70(c)(2)(1976)), this was the obvious choice for the point to which we would direct our survey.

The survey, a copy of which accompanied Mr. Lawrence's letter to Mr. Weiss, was distributed to all members of The Society's PVC Safety Group. The membership of this Group represents approximately 93% of domestic PVC resin production. We received survey responses representing nearly all companies and plant locations manufacturing PVC suspension resins. The data submitted are compiled in the attached report of the survey results.

The only question in the survey not answered in the report concerns the time when future expectations are forecasted to be met. Although the range of times reported was from "no change expected" to "end of 1981," the "future" column could not be uniformly characterized because the responses were very mixed and fell randomly into two groups, viz. (1) by the end of the first half of 1980, and (2) by the end of 1981.

We hope that both you and Mr. Weiss will find the attached survey results to be informative and the foregoing description of why and how they were collected sufficient for your purposes. As always, however, should you have any additional questions, comments or suggestions with regard to any aspect of this matter, please do not hesitate to let us know.

Cordially yours,


Joseph E. Hadley, Jr.

Enclosure

cc: Mr. John R. Lawrence

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