



Interoffice Communication

To Ron Bryan - LC VCM
From J. C. Ledvina
Date October 26, 1982
Subject PCB INCIDENTAL MANUFACTURE

I recently sent you a copy of draft PCB rules applying to incidental manufacture of PCBs. The rules were published on October 21, 1982 (47 FR 46980) and will be effective November 22, 1982. These rules apply to a number of situations, but as I understand it, we've found approximately 30 ppm monochlorinated biphenyls in the VCM heavies. VCM heavies are then mixed with EDC heavies and sent to PPG for byproduct recovery and incineration.

The draft regulations, as they apply to our situation, state that if we incidentally manufacture any PCB congener (which include monochlorinated biphenyls) in quantities greater than 2 ppm and the PCBs are isolated in a waste stream, that we must apply to EPA for an exemption to TOSCA 6(e). The PCB-laden stream must be stored per the PCB storage requirements and disposed of in a PCB-approved landfill or incinerated in a RCRA-approved incinerator.

One of the questions Paul Fetzer asked was whether we should attempt to permit the VCM incinerators to burn PCBs. I suggest we not do this since securing approval to do so is both expensive and controversial because of public participation in the approval process. Secondly, the draft regulations require only a RCRA-approved incinerator.

RCRA approval also involves stack testing and 99.99% destruction efficiency. For now, I think getting RCRA approval for the VCM incinerators is not worth the effort since there are a number of commercial RCRA-approved incinerators within a few hours drive from Lake Charles. Also, if PPG's incinerators are RCRA-approved or they intend to get approval, we can continue using them.

I believe it is wise to reduce our inventory of heavies as low as possible before the regulation becomes effective.

Also, we should begin isolating VCM heavies from EDC heavies to minimize material requiring special handling.

Storage of incidentally manufactured PCBs is to be in accordance with the PCB storage regulation. Section 761.42(c)(7) speaks to storage in containers larger than 55 gallon drums but does not clearly state what must be done. Before November 22 and until further notice, I recommend you revise your SPCC Plan to specifically refer to those tanks containing PCBs and caution anyone using the Plan that PCBs are to be contained under all circumstances. The tanks should be marked with PCB labels and inventory records kept. Shipments to PPG should be documented.

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Ron Bryan
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For now, I don't have a good suggestion on how to handle such real problems as wastes generated during maintenance, clean-up, or turn-around of tar stills, tanks, or trucks. Somehow, however, I believe the answer lies in the de minimus levels EPA has specified in the regulation.

I've been talking to other VCM producers about incidental manufacture. BFG says they don't make PCBs; my guess is they haven't done the analysis. Dow and Diamond Shamrock have reportedly found some PCBs. Ethyl and Shell have told me they found PCBs; Shell's were at two plants in the 10-20 ppm range. Rumor is that Diamond Shamrock found more PCBs than Shell.

I expect that companies will be getting together to discuss their problems. If a trade association doesn't sponsor this, I'll get something going.

I'm sure we'll be discussing this more. Give me a call as issues come up.

J. C. Ledvina

ajo

SAL 000052895

12/29/82.

Paul Fetzer -

Ponca City samples: Vinyl TAR Still 78-80 ppm
High was immediately after
decoking

HCl generated with 8% into light ends then
burn light ends in incinerator. No
PCBs about 10 ppb

Vinyl TAR

Still	EDC	ppm.
out	7.7	78-80
	17.1	57
	26.7	47

TAR STILL feed

1.6	ppm.
2.1	"
3.6	"

all monochlorinated

Vinyl TAR Still
3 samples in Ponca.
before decoking

Vinyl TAR Still.
3 on Fetzer's desk.
taken 10 days after
decoking

Combined stream EDC TAR + Vinyl TAR
5-10 ppm

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for: TOSCA 6(e)
PCBS
Manufactured Mfg.

Discount Factors SOX memo, 5x de.

Measure PCB content in materials leaving the Plant.
Divide by discount factor if appropriate.

Exclusion is Achievable if ^(a) PCBs (after applying discount factor) are below 25 ppm ^{annual} avg. (50 ppm max)

(b) Consumer products, including plastic Bldg materials, must be below 5 ppm. (This could apply to vinyl chloride)

(c) air vents are below 10 ppm.

(d) PCBs in water is below 100 ug/l per resolvable peak.

In addition, a ^{letter} certification is required ~~is~~ within 90 days of the ^{promulgation} ~~effective~~ date if:

any product leaving the site contains more than 2 ug/g (2 ppm) per resolvable peak.

However, if we believe no product contains greater than 2 ppm (after applying discount factor) no letter or certification is required.

Report to EPA must be made when. PCB in product leaving any mfg. site exceeds 0.0025% of the rate capacity for the ~~site~~ manufacturing processes as of the promulgation date...

or. over 10 lbs of PCBs are released to the air.
in ^{a calendar} any year

or. over 10 lbs. of PCBs are discharged in wastewater in a calendar year.

WE should

a) more samples of Tar still bottoms.

b). Sample Tar still OH ?

c). PCBs in KM ?

d). PCBs in HCl ?