

7/1
VC

LAW OFFICES
KELLER AND HECKMAN

1150 17TH STREET, N. W.

SUITE 1000

WASHINGTON, D. C. 20036

JOSEPH E. KELLER
JEROME H. HECKMAN
CHARLES M. MEEHAN
WILLIAM H. BORGHESE, JR.
ROBERT R. TIERNAN
MALCOLM O. MACARTHUR
WAYNE V. BLACK
DAVID L. HILL
MARTIN W. BERCOVICI
JOHN S. ELORED
CAROLE C. HARRIS
MICHAEL F. MORRONE
LARRY S. SOLOMON
JOHN B. DUBECK

CHRISTINE A. MEAGHER
SHIRLEY S. FUJIMOTO
PETER L. DE LA CRUZ
LAWRENCE P. HALPRIN
DEBORAH SHUR TRINKER
C. DOUGLAS JARRETT
EDWARD L. KORWEK
ROBERT L. FLESHNER
JONATHAN P. LEVINE
SHEILA A. MILLAR
RUSSELL H. FOX
LEE H. WEINER
ANGELENA C. LE BLANC

(202) 457-1100

RECEIVED

SEP 10 1982

R. W. Laundrie

TELECOPIER
(202) 296-7682

CABLE ADDRESS "KELMAN"

WRITER'S DIRECT DIAL NUMBER

(202) 457-1116

September 3, 1982

cc. Jenett
R. Jackson
H. Kraft

TO: SPI PVC Safety Group
SPI PVC Manufacturing Technology Committee

Re: EPA Review of the Vinyl Chloride Standard

Ladies and Gentlemen:

We have received a response from the Environmental Protection Agency (EPA) to our letter of July 12, 1982, suggesting several amendments to the vinyl chloride standard. A copy of EPA's letter is enclosed. The letter will be discussed at the Manufacturing Technology Committee's meeting on September 14, 1982.

EPA was not receptive to the suggestion that the term "malfunction" be substituted for the term "emergency" in characterizing permissible relief valve discharges. Obviously, this is the most difficult section to negotiate and will need face-to-face discussions with EPA. The Agency, however, was interested in a suggestion that discharges of less than 100 pounds be exempted. While the EPA staff has a number of questions, it appears that they can be readily answered.

As reported previously, EPA agrees that relief valve discharges should be reported on a semi-annual basis. We expect this to be accomplished through the use of section 114 letters to individual firms establishing a semi-annual reporting period. Any subsequent rulemakings would presumably codify this change.

EPA characterized the daily analytical compositing of stripping samples as reasonable but was concerned with the specification of an analytical procedure. The Agency asked for suggestions on a recommended procedure. Similarly, the Agency seemed responsive to a suggestion that emission monitoring span

GENC 014176

KELLER AND HECKMAN

September 3, 1982
Page 2

checks be conducted on a weekly rather than daily, basis. EPA asked for some justification in terms of the time need for daily span checks and how much reliability would be lost if the frequency of calibration was changed.

Finally, EPA appeared willing to make some changes to the general provisions of the hazardous air pollutant regulations. Modification of the general provisions would be responsive to a suggestion by the Group that the new source regulations be amended to avoid duplicative permitting requirements.

After the ~~September 14 meeting~~ of the Manufacturing Technology Committee, a meeting will probably be arranged with EPA on this matter. In the interim, if you have any comments or questions, please feel free to contact us.

Cordially yours,

Peter L. de la Cruz
Peter L. de la Cruz

Enclosures

I wasn't invited. We no longer belong to SPI.

GENC 014177