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06-K-004

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CABLE ADDRESS "KELMAN"

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April 7, 1983

SPI Vinyl Institute
SPI Manufacturing Technology Committee

Re: EPA Review of the Vinyl Chloride Standard

Ladies and Gentlemen:

As part of its review of the vinyl chloride standard, the Environmental Protection Agency (EPA) distributed a letter dated February 25, 1983 forwarding a revised report by TRW, Inc. and a draft "Chapter 6" which discusses plant parameters and regulatory alternatives. The Manufacturing Technology Committee met in Houston on March 24 to develop a response to the EPA mailing. A copy of the draft comments developed by the Committee is enclosed for your review.

The deadline for filing comments with EPA is April 15. Therefore, we request that you contact us with your suggestions and changes by April 13.

Also enclosed is a letter from Bill Grimley at EPA. It responds to our earlier suggestions concerning the compositing of polyvinyl chloride (PVC) samples for testing. Mr. Grimley concluded that there is no existing sample compositing procedure that is sufficiently rigorous for development of an EPA reference method. We would appreciate your reaction to his letter and an indication of the Institute's interest in pursuing this matter.

We look forward to receiving your comments.

Cordially yours,

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

Enclosures

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H.S. & F. S. S. S.
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J. A. M. [unclear]

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WRITER'S DIRECT DIAL NUMBER

(202) 457-1116

February 25, 1983

TO: SPI Vinyl Institute

RE: EPA Revision of the Vinyl
Chloride Standard

Ladies and Gentlemen:

The Environmental Protection Agency (EPA) should be sending a package of materials to interested firms within the next week. It is anticipated that the mailing will have three parts. The first section will contain the February 1982 version of the TRW report. While we reported on this previously in our letter of July 20, 1982, the revised TRW report has never been officially released by EPA. This mailing will constitute its official dissemination.

The second portion of the EPA mailing will concern regulatory alternatives for the control of oxychlorination vents at vinyl chloride monomer (VCM) facilities. While the precise language of the alternatives is not known, we expect that EPA will seek to control emissions through incineration or some other manner. It is also our understanding that this requirement would be imposed on both new and existing sources.

The third portion of the EPA mailing will address the use of vinyl chloride as a raw material in applications other than the production of polyvinyl chloride (PVC). In particular, EPA will be recommending that firms using VCM as a raw material adopt a fugitive emission control program.

The other changes that we discussed with EPA, including relief valve discharges and exception reporting, are being handled separately. Because these changes would be either administrative or interpretative in nature without imposing additional costs on industry, the Agency determined that it did not need to prepare the same type of background documentation associated

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with typical standards development. The relief valve discharge and other questions, however, will be considered in the course of the rulemaking.

After receiving industry comments on the oxychlorination vent and new fugitive emission package. EPA will schedule an internal working group meeting of various EPA personnel including representatives from the EPA regional offices. That meeting will mark the first agency-wide review of the proposals. Subsequently, the proposals would be revised and undergo further review following standard EPA procedures.

After we have received and reviewed the EPA mailing, we will consult with the Vinyl Institute representatives to determine a course of action. In the interim, if interested persons do not receive a copy of the EPA mailing within the next few weeks, please contact us so that we may provide you with the material.

Cordially yours,

Peter L. de la Cruz
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