

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. BORGHESE, JR.
ROBERT A. TIERNAN
MALCOLM D. MACARTHUR
WAYNE V. SLACK
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EDWARD L. KORMER
SHEILA A. HILLAR
RUSSELL H. FOX
LEE M. WEINER
TIMOTHY BROWN
ILENE RINGEL KELLER

TELECOPIER
(202) 266-7682

CABLE ADDRESS "KELMAN"

WRITER'S DIRECT DIAL NUMBER

(202) 457-1116

April 15, 1983

To: SPI Vinyl Institute
SPI Manufacturing Technology Committee

Re: EPA Review of the Vinyl Chloride
Standard

Ladies and Gentlemen:

Enclosed is a copy of comments filed with the Environmental Protection Agency (EPA) in response to a letter from the Agency dated February 25, 1983. The comments are in response to a revised report by TRW, Inc. and a draft "Chapter 6" which discusses plant parameters and regulatory alternatives.

The comments reflect the work of the Manufacturing Technology Committee and your response to a draft letter previously circulated to the Vinyl Institute.

The two enclosures to the comments are not included with this mailing. The first enclosure is a July 12, 1982 letter from The Society of the Plastics Industry, Inc. (SPI) to Don Goodwin at EPA presenting suggested amendments to the vinyl chloride standard. You should have a copy of that letter in your files.

The second enclosure to the comments was a paper by B.C. Davis entitled "A Flare Efficiency Study," which was presented at the AIChE March 1983 meeting in Houston, Texas. The paper, which was brought to our attention by John Barr, summarizes the EPA study by John Zink Company which measured the efficiency of flares and found it to be greater than 99+%.

If you need copies of either enclosure or have any comments or questions, please feel free to contact us.

Cordially yours,

VVC 000006886

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

Enclosure