

INTER-OFFICE MEMO

TENNECO CHEMICALS, INC.

To W. Miringoff

FROM D. E. Rhoads

SUBJECT EPA - VCM

AT	J. P. SANDSTEDT	DATE	Sept. 29, 1981
AT	SEP 30 1981	COPY TO	G. Flint J. Sandstedt
RECEIVED			

The following comments were presented by Mr. Gary Baise from the law firm of Beveridge and Diamond at the Vinyl Chloride Safety Association meeting luncheon on September 24, 1981. He felt that EPA currently has inexperienced administrators and has considerable distrust between the various departments which will significantly limit their progress in new rule making. EPA hired TRW to survey chemicals. EPA terminated the contract after TRW completed phase one. Mr. Baise expects an advance notice of proposed rule making will be issued. He made the following forecast for phase two of this study based on staff recommendations for the next two years.

1. Withdraw 1977 proposal.
2. This will signal the agency is no longer supporting zero emissions.
3. EPA is worried about EDF reaction.
4. They will review each situation to determine the best available technology. If best available technology does not protect the public health, then they will require better.
5. They will leave 10 ppm standard and not go to 5 ppm.
6. On reactor opening losses, they did not have new technology.
7. Stripping will not be lowered because of the problem in defining resins.
8. Fugitive emissions (leak detection). The best programs currently are considered the best available technology and, therefore, some companies will have to come up to this level.
9. Relief valve discharge - working on it to better define enforcement. Possibly they will develop a list of non-preventable releases.
10. Malfunction argument. The agency has accepted it by actions but not in writing.
11. Fixed point monitoring will no longer be needed. Manual monitoring such as in the leak detection and repair program will be adequate.
12. Waste water will not include gas holder seal water.
13. Test method 107 will be simplified.
14. Fabricating plants will be dropped from regulation.
15. To study transfer from tank cars or barges.
16. The landfill scare is over and is not considered to be a problem.

D. E. Rhoads

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