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APR 2 1975

Date 31 March 1975

INTEROFFICE
MEMORANDUM

APCI CHEM. GROUP ^{Subj.} NAPCTAC Meeting, Arlington, Va.
LAW DEPT. on 25 March 1975

To T. L. Carey

Valley Forge

(Location, Organization, or Department)

From J. T. Barr

Valley Forge

(Location, Organization, or Department)

cc: A. R. Adams
A. J. Diglio
R. Fleming
A. K. McMillan

J. T. Sebastianelli ✓
Jones/Primeau
Kramer/Speed

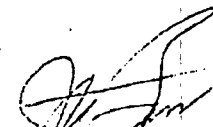
Attached is a copy of the prepared statement by the technical committee of the SPI producers group that was presented to EPA and NAPCTAC on March 25th. Also attached is a copy of the agenda for that meeting, a description of the committee and its functions, together with a listing of the members. Those members who were present have been marked. The discussion on Vinyl Chloride was completed on March 25th and not carried over to the 26th.

This presentation was prepared by the technical committee in several working sessions in Washington during the previous week, and reviewed by the SPI steering committee on March 20th, and then by the larger group of member company representatives on the 24th of March.

The presentation generally was well received and resulted in considerable give-and-take type questioning from the NAPCTAC and EPA representatives. Several points were conceded to the industry and, I believe that we made some progress in getting omitted from the proposed standard a number of bothersome minor details such as connecting relief valve vents, flares, and some of the water regulations. It also appears that the dispersion resin industry will be granted a separate higher residual monomer concentration.

Another visit is planned to Durham for sometime shortly after the next steering committee meeting which will be held in Washington on April 11th. Each company has been asked to submit its own detailed comments on the entire support document within the next week.

The schedule planned by EPA still anticipates declaring Vinyl Chloride a hazardous substance and publishing the proposed standard by June 20th, with a public hearing to follow within 30 - 45 days.


J. T. Barr

JTB/dm

attachments

(320)

AP00027593

SP

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

250 PARK AVENUE • NEW YORK, NEW YORK 10017 • 212/573-9400

March 27, 1975

TO: VCM and PVC PRODUCERS GROUP

Gentlemen:

This correspondence is intended to provide you with an update on our activities relative to the EPA Standard Support Document and the NATCTAC review of this document at the March 25 meeting. In sequence, here are the activities that have occurred:

- 1 - EPA provided us with copies of its report on March 6. Copies were made and circulated to all Producer Group companies from the Keller and Heckman office on March 8.
- 2 - The Technical Subcommittee of the Producer Group's EPA Committee developed a critique of the EPA document and proposed Standard during 4 days of working sessions on March 14, 19, 21 and 24. This resulted in the preparation of the report entitled "Comments on EPA's Proposed Standard for Vinyl Chloride" (copy attached) that served as the basis of the industry's oral presentation made at the NAPCTAC meeting on March 25.
- 3 - Simultaneously with the above activities a special report on dispersion resins was prepared during a work session in Cleveland on March 3 and much activity coordinated through the SPI office. The need for this special report was identified on the occasion of the Technical Subcommittee's visit at the EPA's Engineering Division offices on February 25. This report (copy attached) was finalized and presented to EPA at the NAPCTAC meeting.
- 4 - The Technical Subcommittee's presentation and questioning by NAPCTAC and the EPA staff lasted approximately 3 and 1/2 hours. It was the consensus of our speakers that the industry's presentation was well received. It's our belief that as a result of the presentation - EPA will give additional thought to the proposed standard relative to the following:
 - a) rupture discs on safety valves (A-3).
 - b) flares for emergency vents (A-4).
 - c) control of VC in process water where there is redundancy with other sections of the standard (A-9).

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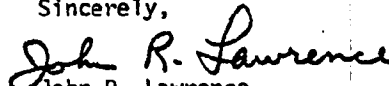
- d) control techniques for handling emissions from dilute streams of VC.
- e) a separate standard applicable to dispersion resins.
- f) clarification as to whether the emissions down stream from the stripper of 400 ppm VC has the alternative of controlling dryer exhaust vent to less than 10 ppm.
- g) control of emissions from the oxychlorination vent.

The immediate needs relative to continuing our dialogue with EPA as it develops its final standard are as follows:

- 1 - Develop an economic analysis relative to the effect of the proposed standard on the industry. Mr. Harry Connors is heading the task force assigned to this project.
- 2 - Carry out a thorough analysis of Chapter 2 on Health Hazards of EPA's Support Document. Dr. Ross Adams is heading the task force assigned this project.
- 3 - Provide production data on dispersion resin manufacturing to support the industry's request that there be an alternate standard for these materials.
- 4 - Provide Mr. Goodwin with any significant additional comments on the Standard Support Document that apply particularly to your own company's situation that were not covered in the industry's comments at the NAPCTAC meeting. Mr. Goodwin requested such comments be supplied by April 1 or as soon thereafter as possible.
- 5 - Continue close contacts with EPA's Engineering Division staff to assist them in whatever way we can to understand the industry's problems.

Please make note of the April 11 meeting of the full VCM and PVC Producers Group as covered in the enclosed Meeting Notices.

Sincerely,


John R. Lawrence
Technical Director

cc: R. L. Harding, SPI
J. Hadley, Keller and Heckman
W. D. Ruckelshaus, Ruckelshaus, Beveridge and Fairbanks
Producers Group's EPA Steering Committee

AP00027595

A G E N D A

NATIONAL AIR POLLUTION CONTROL TECHNIQUES ADVISORY COMMITTEE

Crystal Mall Building 2, Room 1112
1921 Jefferson Davis Highway, Arlington, Virginia 22202

March 25 and 26, 1975

March 25

9:00 - 4:30	VINYL CHLORIDE	
	Regulations	Les Evans
	Economic Impact	Bill Hamilton
	Environmental Impact	Susan Wyatt
1:00 - 2:30	Industrial Comments	Society of Plastic Industries

March 26

9:00 - 10:00	VINYL CHLORIDE (Continued)	
10:00 - 4:30	Progress Report - COKE OVEN REGULATIONS	
	European Technology	Drew Trenholm
	Data Base	Reid Iversen
	Test Results	Roy Neulicht
	Industrial Comments	John Brough (AISI)

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NATIONAL AIR POLLUTION CONTROL TECHNIQUES ADVISORY COMMITTEE

AUTHORITY

Established by the Surgeon General, U.S. Public Health Service, Department of Health, Education, and Welfare, on March 4, 1968, under section 110(d) of the Clean Air Act, as amended; reestablished by the Administrator, Consumer Protection and Environmental Health Service, pursuant to the Secretary's Reorganization Order dated July 1, 1968; transferred to the U.S. Environmental Protection Agency pursuant to Reorganization Plan No. 3 of 1970; reconstituted by the Administrator on June 8, 1971, pursuant to sections 108(b)(1) and (2), and 117(f) of the Clean Air Act, as amended; rechartered January 5, 1973, to include requirements of section 9(c) of the Federal Advisory Committee Act, P.L. 92-463; revised April 24, 1973, to assign an additional function; and terminating January 4, 1975, unless extension beyond that date is authorized in accordance with section 14 of the Federal Advisory Committee Act.

STRUCTURE

Consists of the Deputy Assistant Administrator, Office of Air Quality Planning and Standards, or his designee, as Chairman and 16 members appointed by the Administrator for overlapping terms of one to four years. Members are selected from the chemical, engineering, biomedical, and socioeconomic disciplines resident in universities, State and local governments, research institutions, and industry. Members are selected also for their technical expertise and/or interest in the development of air pollution control techniques.

FUNCTIONS

Advises the Deputy Assistant Administrator, Office of Air Quality Planning and Standards on the latest available technology and economic feasibility of alternative methods to prevent and control air contamination to be published in air quality control techniques documents. Also advises on informational documents regarding air pollution control techniques and testing and monitoring methodology for categories of new sources and air pollutants subject to the provisions of sections 111 and 112 of the Clean Air Act, as amended. In addition, the Committee, through a subcommittee, periodically reviews Air Quality Planning and Standards program accomplishment plans and the associated contracts and grants awarded to carry out these plans.

ACCOMPLISHMENTS

The Committee held two open meetings during 1973. The average non-member attendance at both meetings was between 50-80. In February, the Committee reviewed with EPA staff technical data upon which new source performance standards for the following industries are to be based: kraft pulp mills; coal preparation plants; ferroalloy plants; stationary gas turbines; electric arc furnaces; primary aluminum smelters; and phosphate fertilizer plants including wet process phosphoric acid, superphosphoric acid, diammonium phosphate, granular triple superphosphate, granular triple superphosphate storage, and run-of-pile triple superphosphate. In May, EPA had new source performance standards for coal preparation plants, kraft pulp mills, phosphate fertilizer plants, and primary aluminum plants and briefed the Committee on the proposed regulations. Standards for stationary gas turbines, ferroalloy plants, and electric arc furnaces were reviewed in detail with the Committee, including much new data which had recently been collected from the industry and from EPA source tests. They also reviewed the Group IIA new source performance standards for copper, lead and zinc smelters. EPA's final position on new source performance standards for these sources was approved by the Committee. Regulations were reviewed and published by the Committee on (1) National Emission Standards for Hazardous Air Pollutants; (2) The Group II New Source Performance Standards; and (3) Regulations covering emissions during startup, shutdown, and malfunction for all sources covered under standards of performance for new stationary sources.

March 1975

ENVIRONMENTAL PROTECTION AGENCY
NATIONAL AIR POLLUTION CONTROL TECHNIQUES ADVISORY COMMITTEE

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