



→ W. C. Holbrook

Roy T. Gottesman
Executive Director

VIA AIR MAIL

October 23, 1985

Mr. H. Nieuwen Huijfen
Technical Manager
Akzo Chemical Co.
P. O. Box 7020
Rotterdam, HOLLAND

Dear Mr. Huijfen:

I have learned that at the recent Vinyl Chloride Safety Association meeting held at Innisbrook, Tarpon Springs, Florida, you had made some comments concerning the finding of dioxin in the aqueous discharge from an EDC plant.

I am writing to request any further information that you may have on this matter including any reports or references that you can make available to me. The matter is obviously of interest to member companies comprising The Vinyl Institute.

Thank you for your kind consideration of this request. I look forward to hearing from you.

Sincerely yours,

Roy T. Gottesman

RTG:g

bcc: Mr. W. C. Holbrook - BFGoodrich

"W.C" --For your information. I'll let you know when I get a reply.

Roy

A Division of

THE SOCIETY OF THE PLASTICS INDUSTRY, INC.

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VVV 000003894

Vinyl Institute Manufacturing Practices Committee

The Hilton Inn Florida Center
7400 International Drive
Orlando, Florida

Thursday, December 19, 1985
Friday, December 20, 1985

Attendees

J. Barr, Air Products & Chemicals
W.C. Holbrook, BFGoodrich, Chairman
N. Blackman, Borden Chemical
W.B. Barton, Borden Chemical
A. Gellner, CertainTeed
J. Ledvina, Vista Chemicals
R. Oubre, Dow Chemical USA
J. King, Occidental Chemical
J. Kachtick, Tenneco Polymers
F.E. Borrelli, Georgia Gulf
R. Romano, Chemical Manufacturers Association
M.N. Scheck, Vinyl Institute
P. de la Cruz, Keller and Heckman

1. Self Introductions

Committee Chairman Holbrook asked for self introductions and noted the presence of R. Romano of the Chemical Manufacturers Association. Holbrook asked the Committee members if there were additional items to be added to the Agenda for the meeting.

2. Effluent Guideline Limitations

Barr noted that the VI submitted comments December 16, 1985 to the USEPA on their effluent limitations guidelines rulemaking for the organic chemicals, plastics and synthetic fibers point source category. Barr indicated that the EPA's Regulatory Agenda indicates that the agency expects the rulemaking to be released late in 1986. The committee had a lengthy discussion of the need to gather more data that could be used when promulgation of the regulation takes place. It was decided that each company would assemble data on a reasonable estimate of the cost of meeting the guidelines. To the extent possible, such estimates should be for total dollars and for dollars per pound for the entire facility.

3. Vinyl Chloride Storage Paper

Barr reviewed the background of the position paper on vinyl chloride storage as originally discussed at the Committee's September 11 meeting at Innisbrook, Florida. Since that time, Barr has received comments from two individuals. It was agreed that the project should be pursued. Barr stated that if there are any additional comments he would like to receive them by the end of January so that he can begin preparing a draft for committee review.

4. Methodology for Ranking the Degree of Hazard Associated with Exposure to Carcinogens and Other Toxic Substances

For the Committee's information, Barr noted a Spring 1985 CERCLA Report on the potency of carcinogens and noted that the reportable quantity of

vinyl chloride is 100 pounds based on chronic toxicity. Barr noted that he would send Scheck the citation for the report:

E. Anderson, et. al.

EPA/600/D-85/040

PB 85-167906, February 1985

"Methodology for Ranking the Degree of Hazard

Associated with Exposure to Carcinogens and other Toxic Substances"

5. PVC Latex

Barr noted that the November 5, 1985 National Toxicology Annual Plan includes "PVC latex" on its priority chemicals for listing. Romano noted that this listing usually starts a long testing program even if nothing is found early in the testing program. It was suggested that the VI Medical Subcommittee follow up on this item.

6. NESHAPS General Amendments

Barton reviewed in detail the November 7, 1985 Amendments to 40 CFR Part 61. Copies of his report were distributed to the Committee by Scheck December 23.

7. Review and Update: Formosa Plastics Corporation, Delaware City

Borrelli reviewed the background of the Formosa violations over the last two and a half years and briefed the committee on activities in Delaware since the time the original Consent Order was signed. Borrelli noted his meeting with the Governor and conversations with the Mayor of Delaware City, as well as activities of the Chemical Industry Council, and the open house held at the Delaware City industrial complex in conjunction with CAER. Borrelli noted that he had offered the Governor's staff the resources of the VI.

In conjunction with the Executive Board's December 4 discussion regarding the appropriate activity of the VI in conjunction with events at Formosa Plastics, the Committee reviewed in detail the contents of the Court of Chancery decision, the March 13, 1985 Consent Order and the Supplemental Consent Order. Counsel distributed the draft of a letter to Delaware Governor Castle.

The Committee decided that a meeting of a special task force would take place on January 8 at 8:30 am at the Offices of Keller and Heckman for the purpose of finalizing a letter to the State of Delaware. Such letter would refer to Castle's speech on good industrial neighbors, discuss in detail the problems with the Consent Order, and offer an industry task force to review the submissions made by Formosa in accordance with the provisions of the Supplemental Consent Order. The Committee discussed a proposal to "give" Formosa industry technology. The task force established for the meeting on the 8th is to include: Holbrook, Ledvina, Borrelli, Gottesman/Scheck, and de la Cruz.

8. CMA Liaison: EDC Panel

Bob Romano of CMA (Associate Director of Biomedical and Environmental Special Programs) reviewed for the Committee CMA's work on EDC. Romano noted that with the "Intent to List" notice, the CMA EDC Panel had been revitalized. Romano reviewed a December 11, 1985 meeting with EPA and 3 CMA panels (Ethylene oxide, butadiene, and EDC). EPA noted at this meeting their intent to focus on short term releases (referred to by the EPA contractor as "killer" releases -- contractor for EDC is Midwest Research Institute, Marjorie Putnam). Romano noted that the Radian questionnaire originally developed for butadiene will go out generally.

Romano further noted that EPA intends to send "114" letters to 12 companies (16 sites) in the January 5-10 timeframe, with a 6-week response time. According to Romano, companies to receive the letters include: Arco, BFGoodrich, Diamond Shamrock, Dow, Vista, Ethyl, Formosa, Georgia Gulf, Olin, PPG, Shell, and Vulcan.

Romano noted that CMA believes that EPA legally needs to get OMB clearance on these letters, because they are going out to more than 10 companies, but EPA claims that the letters constitute follow up on earlier work.

Holbrook noted that since it appears as though it is the intention of EPA to regulate, that the Committee should get together after receiving the questionnaire, to assure consistency in interpretation of definition. A late January 1986 date is most likely, at the call of the Chairman.

For purposes of further coordination with CMA, it was suggested that the VI take the lead in the air area, while CMA continue its activities in the area of health and risk assessment as it relates to EDC.

9. Annual VI Safety Award

Scheck noted the responses received to date from the VI member companies on votes for the Annual VI Safety Award. As not all companies had voted on the nominees, it was decided that Scheck should redistribute the ballot and supporting documents to companies that were non-responders.

The Committee voted to institute a yearly award based on best performance (calculated on OSHA recordables) during a calendar year). It was further decided that competition would be on a plant by plant basis, rather than on a company basis. It was agreed that member companies would provide their information to John Barr by the end of February and he would summarize the results for the Committee. Appropriate awards (plaques) would be distributed in conjunction with the Annual Meeting, with press reports for the local press of the recipient companies.

10. Update on Vinyl Chloride Standard

It was noted that the proposed revision to the standard has been distributed at the Assistant Administrator level. It was reported that EPA hopes to finalize the proposal in September/October 1986.

11. Review of EPA's Survey of Ethylene Dichloride Emission Sources

Holbrook reviewed his concerns relative to the above named report and stated his belief that the VI should carefully review the document and provide comments to the Agency on those portions dealing with EDC manufacture. The Committee reviewed the document thoroughly; counsel to develop draft comments based on discussion.

Relative to the discussion appearing on page 1-3, it was noted that none of the VI members discharge from EDC facilities to POTWs, and that the notation in the report that compliance with the effluent limitations guidelines will reduce the amount of EDC in the wastewater streams discharged to POTWs is incorrect. The Committee further noted that tables 2-4 need to be revised to reflect the use of 99.99 percent efficiency for process vents, not the 98 percent figure reflected on pages 2-7. Table 2-5 is for VOCs and not EDC emission factors.

12. Jacobs Engineering Report

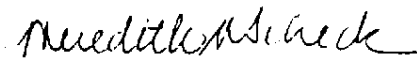
Bob Oubre reviewed the report he received from Jacobs Engineering. Oubre noted the glaring deficiencies in the report, noting that the baseline data is all pre-NESHAPS. Oubre noted that Jacobs is interested in having input directly, but that their timeframe is extremely short. It was agreed that Dow would recontact Jacobs and give them information as to whom to contact, stressing that the report needs a total rewrite before it goes to Congress.

13. Review of EPA's Survey of Carbon Tetrachloride Emission Sources (EPA-450/3-85-018)

The Committee reviewed in detail Chapter 5 of the Report, "Ethylene Dichloride Production." As a base for the discussion, the Committee members agreed that the Agency should not assume carbon tetrachloride emissions for all of the industry based on limited input from three companies and further that equipment counts do not equate to leaks. de la Cruz to develop draft comments based on Committee's discussion of the information as developed by EPA's contractor, MRI.

14. There being no further business at this time, the Committee adjourned at noon, December 20. It was noted that the task force on the Formosa letter is to meet January 8, 1986 and a meeting of interested committee members will be scheduled following the receipt of the letters mentioned in #8 above.

Respectfully submitted,



Meredith N. Scheck

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DISTRIBUTION:

Barton, W. Bailey
Blackman, Nat M.
Borrelli, Frank E.
De La Cruz, Peter
Gellner, A.
Gottesman, Roy
Holbrook, W. C.
Kachtick, J. W.
King, Joseph
Ledvina, Joseph C.
Mullins, J. A.
Oubre, Robert
Samelson, Richard

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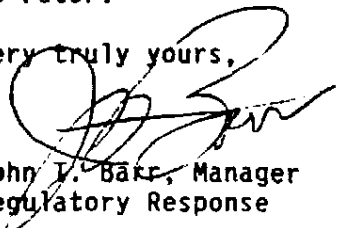
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Attached is the revised draft of our proposed comments to the EPA on the 17 July notice covering the effluent guideline rulemaking. I have considered the comments received from you on the earlier draft, and the draft CMA comments.

Please get your comments to Peter de la Cruz before 1 December. He will make the final revision for a letter to go out over Roy Gottesman's signature.

If appropriate, I would be agreeable to a sentence stating that we have reviewed the draft CMA commentary and generally support their position. Please give your thoughts on this to Peter.

Very truly yours,


John I. Barr, Manager
Regulatory Response

JTB:csb
Attachment

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