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The Society of the
Plastics Industry, Inc.

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July 9, 1976

cc. VCKarl
H Jewett
M. Glenn
Zile
RECEIVED
JUL 16 1976
R. W. Laundrie

TO: VCM/PVC PRODUCERS GROUP

SUBJECT: EPA REGULATIONS ON VINYL CHLORIDE

You will recall that in the comments we filed with EPA on February 23, 1976 regarding the proposed standard for vinyl chloride, we asked for certain exemptions for research and development equipment. Toward the end of June, we learned that the EPA's engineering staff was considering an exemption on research and development facilities that produced no more than 10,000 pounds of polyvinyl chloride. Since this was an exemption considerably less than what we had asked for, a series of conversations with EPA's engineering staff ensued. These conversations involved certain members of the VCM/PVC Producers Technical Committee and myself.

Finally on July 2, 1976 in a telephone conversation with Miss Susan Wyatt of the EPA staff, I was advised that their recommendation to the EPA Technical Committee on July 9, 1976 would call for control of emissions from PVC Research and Development facilities as follows:

Test equipment of 50 gallons and below are exempt. Facilities greater than 50 gallons and up to 1,000 gallons need to conform to only sections 61.64a, (except a-2), b, c, and d.

Although this may still not be completely satisfactory to all producers, it appears to be a reasonable compromise between what we had originally asked for and what the engineering staff was proposing to recommend.

We can not be certain of the exact language of this portion of the regulation until it becomes available to us. It is my understanding that copies may become available at the time when the regulation is circulated for its inter-agency review. If it is necessary to consider asking for other interpretations to be placed on this exemption, we could consider the best mechanism to influence this regulation at that time.

Very truly yours,

John R. Lawrence
John R. Lawrence
Technical Director

JRL:bzp

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