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THE SOCIETY OF THE PLASTICS INDUSTRY, INC.
PVC SAFETY GROUP
MANUFACTURING TECHNOLOGY COMMITTEE

MINUTES

Ramada Inn
Research Triangle Park
North Carolina

Thursday, April 9, 1981
8:30 a. m.

Summary -

1. The Committee considered various responses or strategies in light of the TRW report and EPA review of the vinyl chloride standard.
2. The TRW draft report was discussed in detail.

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ATTENDEES:

R. W. Laundrie (Chairman), General Tire & Rubber Co.,
One General Street, Akron, OH 44329
Harold (Guy) Dubec, Hooker Chemical, Burlington, N.J. 08016
Joe King, Hooker Chemical, Burlington, N. J. 08016
J. T. Barr, Air Products & Chemicals, Inc. P. O. Box 538
Allentown, PA 18105
J. P. Sandstedt, Tenneco Chemicals, Turner Place,
Box 365, Piscataway, N.J. 08854
W. Bailey Barton, Borden Inc., 180 East Broad Street,
Columbus, OH 43215

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Bob Oubre, Dow Chemical, Oyster Creek Division
Freeport, TX 77541

W. C. Holbrook, B. F. Goodrich Company, 6100 Oak Tree Blvd
Cleveland, OH 44131

A. Y. (Gus) Noojin, Shell Chemical Co., One Shell Plaza
Box 2463, Houston, TX 77001

Peter de la Cruz, Keller and Heckman, 1150 17th Street, N.W.
Suite 1000, Washington, D. C. 20036

Gary Baise, Beveridge & Diamond, 1333 New Hampshire Avenue,
N.W., Suite 900, Washington, D.C. 20036

1. Chairman Landrieu called the meeting to order. Gary Baise discussed general background activities at the Environmental Protection Agency (EPA) and at the Office of Management and Budget (OMB). It was reported unlikely that major policy decisions will be made until mid-summer, when new supervisory personnel have been installed after confirmation of the new Administrator. In particular, it is unlikely that there will be any policy decisions made on agency treatment of hazardous air pollutants. The new Administration wants to run EPA from OMB; it is more likely that personnel located in Washington will be receptive to cost-benefit arguments than EPA staff personnel at Research Triangle Park.

2. John Barr stated that he had prepared an update on VCM literature, but that it really contained no new findings. Apparently the TRW draft report had been screened by the Department of Justice prior to its release to the Committee. Mr. Barr proposed that the Committee stress to EPA that no further TRW activity is necessary because there is no health-effects basis for lowering the standard at this time. EPA should withdraw its 1977 proposal and redefine the definition of "emergency" release in the standard. In addition, a simultaneous effort should be made to have the standard withdrawn through the Presidential Task Force on Regulatory Relief.

3. W. C. Holbrook noted that the whole relief valve discharge question has received media coverage in the Baton Rouge area. EPA has not given much information to the media, and local Occupational Safety and Health Administration (OSHA) personnel are requesting emission data. He also has reason to believe that a report has been prepared by Radian Corporation for EPA Regions I and II indicating that gas holders are dangerous, expensive and not a solution. It could not be determined whether such a report has actually been prepared.

4. Gary Baise mentioned that there were comments in the record by Susan Wyatt as early as 1976 that EPA expects reasonably sized gasholders as part of a containment program. John Barr indicated that Ms. Wyatt had reiterated this point in 1979. Gary Baise suggested that the 1977 proposal poses a legal risk for construction or major modification commenced since 1977, because EPA could argue that the effective date of a final rule will be the date of proposal. While the risk is somewhat tenuous at this point, it seems appropriate to work for withdrawal of the 1977 proposal.

5. John Barr suggested the following as a possible definition for an emergency discharge. "An emergency discharge is a discharge which occurs because of unforeseen developments and which could not be avoided by taking the available actions for its prevention." Bob Oubre suggested that it be modified to read "immediately available actions."

6. The remainder of the meeting consisted of a page by page review of the TRW report. It was agreed that specific criticisms of the report will be combined into a letter to be submitted to EPA after the meeting on April 9. The report assumes that the standard permits zero relief valve discharges when this is not technically correct. In addition, the estimated actual emissions given in tables 4-3 and 4-4 are too high and conflict with the textual discussion of actual emissions.

There was general agreement that the level of fugitive emissions suggested by the TRW report were excessive, and tended to be the product of guess work and the lumping together of calculation errors. A study conducted by Goodrich indicates that fugitives are lower than reflected in the TRW report.

Other regulations would impose a greater burden than reflected in the report, especially state implementation plan (SIP) and volatile organic compound (VOC) requirements. In addition, TRW should be requested to state the sources for their data when not referenced.

The TRW report indicates that EDC/VC plants using a pure oxygen or combined oxygen and air feedstock for the oxychlorination reactor generally have emissions below the standard. W. C. Holbrook indicated that the report is misleading because it tends to show emissions below the standard, where, in fact, their emissions are also below that permitted by the standard.

Robert Laundrie stated that he had been misrepresented because he had never indicated that gasholders could be connected directly to the safety relief valves, and that the TRW report implied this. It was observed that flare efficiency could be determined, but that the TRW report tends to underestimate the cost of flares. In particular, when considering the cost of flares, the report does not consider the cost of constructing the tower to provide the safety separation factor.

John Barr indicated that the report might include more information concerning why carbon absorption does not work and the role of vinyl acetate and methyl chloride in the carbon absorption system.

The report indicates that according to the wording of the current standard only emergency discharges through a "relief valve" need to be reported. The report suggests that discharges through double rupture discs need not be reported. As far as the Group could determine, even those facilities using rupture discs without safety valves report discharges through the rupture discs as relief valve discharges.

The presumption of the TRW report that gasholders will stop and contain emergency discharges was criticized. The discussion of an auxiliary venting system by the TRW report tend to overstate its value in preventing discharges.

The cost of installing the gasholder listed in the report appears to be fairly accurate.

7. The meeting was adjourned at 11:45 a.m., in anticipation of the meeting with EPA and TRW at 1:00 p.m.

Respectfully submitted,

Peter L. de la Cruz
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Assistant General Counsel

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MINUTES

EPA Offices
Research Triangle Park
North Carolina

Thursday, April 9, 1981
1:00 p.m.

SUMMARY -

1. The Committee contended that the second phase of the TRW project and revision of the vinyl chloride standard must be preceded by the development of health effects data that would demonstrate a public health benefit from reduced emissions.
2. EPA indicated that it would move to phase two of the TRW project and operate under EPA's proposed carcinogen policy
3. TRW distributed a memorandum listing areas of particular concern during phase two of the project (copy attached).

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ATTENDEES:

Robert W. Laundrie (Chairman), General Tire and Rubber Co.,
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R. R. Oubre, Dow Chemical, Oyster Creek Division
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Suite 1000, Washington, D.C. 20036

EPA REPRESENTATIVES:

Don Goodwin
Jack Farmer
Leslie Evans
Susan Wyatt
Fred Dimmick
Mike Dusetzina

TRW REPRESENTATIVES:

Marge Cassidy
Robert Hession
C. J. Chatlynne

1. Jack Farmer stated that EPA had established, in a very general sense, areas of the vinyl chloride standard on which it would focus during the second phase of the TRW project. John Barr indicated that prior to commencing Phase two EPA should determine the health effects of vinyl chloride in the ambient air, what the estimated benefits would be from reduced vinyl chloride emissions, and the cost of the proposed regulation. Jack Farmer replied that there was nothing to show that vinyl chloride was not a carcinogen and subject to regulation on that basis.