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Chemical Group
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August 30, 1984

Mr. Jack R. Farmer
Director ESED
USEPA - OAQPS
Research Triangle Park, NC 27711

RE: NAPTAC Meeting August 30, 1984
Agenda Item - Vinyl Chloride

Dear Mr. Farmer:

BFGoodrich Chemical wishes to commend the Agency for reviewing the national emission standard for vinyl chloride (40 CFR Part 61) and drafting proposed amendments thereto. We urge the Agency to continue this endeavor through promulgation of final amendments.

Having the first hand experience of operating nine separate manufacturing plants to which the current vinyl chloride standard has applied now for some eight years since its effective date in 1976, we believe that certain revisions are appropriate and will enhance industry compliance with and Agency enforcement of the vinyl chloride standard. We believe that our operating experience under the existing standard has shown us and the Agency areas where the existing standard needs to be improved; where it can be more clear and specific, and where we can now apply knowns where unknowns and predictions were used in development and promulgation of the existing standard.

The current standard is working. It has accomplished its designed function of reducing vinyl chloride emissions to acceptable levels. Indeed, in my Company, and I believe throughout industry as a whole, actual vinyl chloride emissions are significantly less than allowed levels. However, the standard is in many areas vague, non-specific and overly burdensome. It needs some fixing, but it is not badly broken. So we need to be careful that the revisions make the standard more realistic and workable rather than adding new requirements or extending the coverage.

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With this in mind, we have carefully studied the draft revisions and offer the following comments:

1. We support the Agency's decision to withdraw the 1977 proposed revisions. We believe that such revisions are inappropriate, unnecessary and will not enhance reduction in vinyl chloride emissions.
2. CFR Part 61.61(1)

We question the purpose of revising the definition of "In Vinyl Chloride Service." We believe the proposed definition to be unduly restrictive, and over encompassing. Indeed, it would prevent our application of specific process knowledge and sound engineering judgment and substitute prediction and conjecture therefor. A piece of equipment should not be presumed to be in vinyl chloride service because it could conceivably contain vinyl chloride. This is not sound engineering or regulation. This is not a good test, especially when one is allowed to demonstrate non-vinyl chloride service only if "the percent vinyl chloride content can be reasonably expected never to exceed ten percent by weight for liquid streams and ten percent by volume for gas streams." Never is too restrictive and is not representative of process operations. At times equipment can be in vinyl chloride service while at other times the same equipment will not be in vinyl chloride service. In addition, part of some equipment can be in vinyl chloride service while another part of the same equipment will not be in vinyl chloride service; i.e. the HCl column in a VCM plant.

There is nothing broken with the existing definition of "In Vinyl Chloride Service." EPA should, therefore, not try to fix it. EPA has presented no rationale or discussion supporting the need for a revised definition. The existing definition should be retained and the proposed definition deleted.

3. CFR Part 61.61(o)

EPA has presented no rationale or discussion concerning revising the definition of "ethylene dichloride purification." What is wrong with the existing definition? No justification has been presented for inclusion of storage tanks in this definition. No estimates of vinyl chloride emissions have been presented. No cost impact for including storage tanks has been provided. Absolutely no technical, environmental, or economic justification has been provided. Inclusion of "storage tanks" in this definition would require a capital expenditure of approximately \$2,000,000 at one of our plant sites for retrofitting ten large tanks. This is a high price to pay for very little vinyl chloride emissions abatement. Inclusion of storage tanks in this definition should not even be considered unless it is demonstrated that these storage tanks are a significant source of vinyl chloride emissions and that the cost associated with required controls is justified.

We recommend that the existing definition be retained and the proposed definition be deleted.

4. CFR Part 61.61(p)

It is requested that the phrase "prior to sale or transfer off-site" be deleted. "Vinyl chloride purification" should not be keyed to whether the product is sold or transferred off-site. Indeed, in some vinyl chloride manufacturing plants the product is used on-site to produce polyvinyl chloride.

5. Proposed CFR Part 61.61(v)

The proposed definition of "relief valve" is vague, not clear, overly broad and non-specific. It is not known what is meant by "and other pressure control systems." We believe this definition would set the stage for a lot of confusion. For example, at five of our plants our primary vinyl chloride emission control device includes a pressure operated valve at the discharge point. Would this be considered an "other pressure control system?" Also, would shortstop systems and cooling systems be considered "other pressure control systems?"

We are also concerned that this broad term could be interpreted to include the control systems on process vent streams being ducted to an emission control device. These pressure control systems are designed to protect the control device. As now drafted, the venting to the atmosphere through such a control system of an exhaust gas stream that is required to be controlled to 10 ppm in accordance with Sections 61.62(a), 61.63(a), 61.64(a)(1), 61.64(b), (c) and (d) and 61.65(b) could also be classified as a relief valve discharge. We believe that the discharge of an exhaust gas at a concentration greater than 10 ppm should be classified as an exceedance of the 10 ppm limit and not classified as a relief valve discharge.

We believe that the concept of pressure relief should be kept separate from pressure control which avoids occurrence of overpressure.

The terms "relief valve" and "rupture disc" are terms which have become specific through custom and usage in the field of engineering. Their identity can be established by reference to recognized engineering codes, treatises and literature together with manufacturers' designations.

We believe the definition of "relief valve" should be limited to relief valves, rupture discs and manual vent valves and should not include exhaust gas stream bypasses of emission control devices. The proposed definition should be revised accordingly.

6. CFR 61.61

The existing standard for vinyl chloride and the draft amendments under consideration seek to control relief discharges, exhaust gas and leaks. Nowhere, however, are any of these terms defined. We believe that proper definitions would add clarity to the standard. As is, a leak could in some cases be considered a relief discharge as could exhaust gas. Definitions based on specific features of each of the terms should be incorporated into the standard. For each, features such as purpose, character, controllability, desirability, accountability and occurability should be used in developing an appropriate definition.

For example, exhaust gas has a purpose and is a result of process operations. It is desirable and intended. It has a character of being routine. It is controllable by treatment. It can be monitored and its occurrence is continuous or semi-continuous.

A relief discharge, on the other hand, is episodic and its purpose is safety. It is controlled by avoidance and it is necessary to protect life and property. It can be accounted for by estimation.

Finally, a leak has no purpose, it is not desirable and it is near impossible to account for. It is a result of a malfunction. It is episodic and it can be controlled by repair.

7. CFR 61.62(a); 61.63(a); 61.64(a), (b), (c) and (d)

Except as noted regarding dilution on page 41, first paragraph of the draft preamble, it is not clear why EPA has chosen to propose changing the words "all exhaust gases" to the words "each exhaust gas stream." If there is any other reason for the proposed change, EPA should state such along with rationale, discussion and justification.

The revision as proposed adds confusion rather than clarity particularly when combined with the phrase "ultimately discharged to the atmosphere." The proposed wording should in no way prohibit combining of or mixing of streams prior to treatment and prior to discharge to the atmosphere. We agree that dilution is not an acceptable control mechanism and would not oppose EPA prohibiting such. However, we must for economic purposes maintain the option to combine streams of below 10 ppm and greater than 10 ppm vinyl chloride prior to treatment and discharge to the atmosphere. EPA should also make it more clear that the 10 ppm limit applies at the actual point of discharge to the atmosphere and not to a point prior to treatment or control.

8. Proposed CFR 61.65(a)

We commend and support EPA for proposing a numerical limit for relief valve discharges. The current relief valve discharge standard is vague and essentially non-workable. A clear and precise standard is badly needed.

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We support the proposed emission limit of 0.035 per 100 polymerization batches as noted in 61.65(a)(1)(i), but strongly feel such should be applied plant-wide as in 61.65(a)(1)(ii), 61.65(a)(2) and 61.65(a)(3) rather than according to resin production process. We see no justifying advantage for a mixed standard and request EPA to reword 61.65(a)(1)(i) and proposed part 61.70(d) accordingly.

Clarity also needs to be added to the phrase "discharge to the atmosphere from relief valves" as used in 61.65(a) such that leakage from relief valves are excluded therefrom. Here again, definition of "relief discharge" and "leak" would add clarity.

Finally, as with the current Section 61.65(a), the words "in vinyl chloride service" should be inserted in the first sentence of (a)(1)(i) after the word "reactors." This provides consistency with the existing standard and proposed Sections 61.65(a)(1)(ii) and 61.65(a)(2) and (3).

9. CFR 61.65(b)(8)

We strongly object to changing the leak detection and elimination requirements as proposed. We believe that the leak detection and elimination programs we have in place at our nine different U.S.A. plants are effective in minimizing fugitive emissions and most likely more effective than the Subpart v provisions would be. We have both fixed monitoring and portable monitoring. We have in all cases defined a leak at a level of 100 ppm or less and not at 10,000 ppm as Subpart v would allow. Our portable leak patrol is monthly and in some cases more frequent. Our programs include valves and flanges. We tag and fix leaks in an expedient manner.

We see no environmental benefit from the proposed change. We see increased paperwork and expenses of preparing and submitting new plans and complying therewith.

EPA has not presented any concrete justification for this proposed revision. No estimate of vinyl chloride emission reduction is provided. No cost impact is provided. No specific control technology improvements have been stated.

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We, therefore, request that existing Section 61.65(b)(8) remain unchanged and that the proposed revisions be deleted.

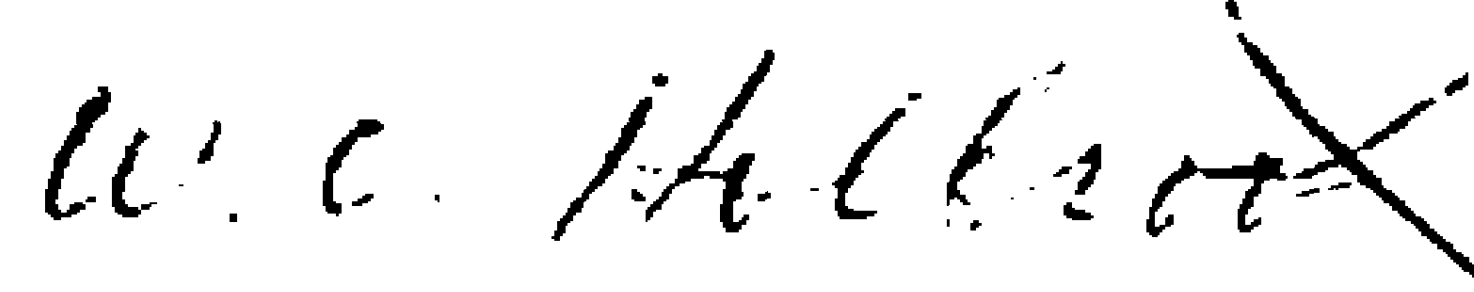
10. Proposed CFR 61.67(g)(5)

The equations stated on pages 57 and 59 double account for emissions by not reflecting or recognizing that vinyl chloride which evolves from the resin after the required stripping level has been attained. Such vinyl chloride should not be counted as ROL because it has already been regulated.

We appreciate the opportunity to comment on the draft proposed regulations. Should you have any questions regarding our comments, please call me.

Sincerely,

THE BFGOODRICH COMPANY
Chemical Group



W. C. Holbrook
Director, Environmental Affairs

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