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August 31, 1984

Roy T. Gottesman, Ph.D.
The Society of the Plastics
Industry, Inc.
355 Lexington Avenue
New York, New York 10017

Re: EPA NAPTAC Meeting

Dear Roy:

On August 30, 1984, the National Air Pollution Control Techniques Advisory Committee (NAPTAC), meeting under the auspices of the Environmental Protection Agency (EPA), reviewed draft revisions to the vinyl chloride standard issued under Section 112 of the Clean Air Act. This letter lists the attendees, provides a brief summary of events, and forwards documents distributed at the meeting.

Attendees

EPA was represented by:

Susan Wyatt
Gil Wood
Bob Ajax
Rob Rosensteel
Les Evans
Fred Dimmick
Mike Dusetzina

Radian Corporation, the EPA contractor on this matter, was represented by Karen Fidler, Jeff Shumaker, and Reese Howle.

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NAPTAC members present at this session were:

Robert Collom - Georgia EPA
Thomas Goodgame - Whirlpool Corporation
Linda Greer - Environmental Defense Fund (EDF)
Roger Randolph - Tulsa City-County
Health Department
Bruce Stiener - Armco Inc.

Members from the Vinyl Institute present at the session were:

W.C. Holbrook - B.F. Goodrich Company
John Barr - Air Products and Chemicals, Inc.
Joe Ledvina - Vista Polymers Inc.
Nat Blackman - Borden Inc.
Bob Oubre - Dow Chemical
Jim Kachtick - Tenneco Polymers, Inc.

Proceedings

Vinyl chloride was the last agenda item on the Committee's two-day schedule. The morning session dealing with Portland Cement was fairly controversial and the vinyl chloride provisions were not reached until 1:15 p.m. There were relatively few questions by the Committee and none of the Committee members appeared antagonistic to the proposal. Except for a few questions by Bob Collom of the the Georgia EPA, state enforcement officials did not appear to have any major concerns. The EDF representative, Linda Greer, did not have any comments or questions on this matter.

Only three members of the public commented on the proposal and these were all Vinyl Institute members. The absence of opposition or criticism to the proposal, except for the Vinyl Institute critique, made this a successful venture since the Institute is supporting this EPA activity. Earlier in the day, copies of the Institute and company comments were provided to the EPA staff for their review. We were informally advised by the EPA staff that the Enforcement Office did not wish to see the proposal go forward. The timing, scope, and intensity of the Enforcement Office's position was not readily discernible. Minutes of the meeting are being prepared and I will forward them to you upon receipt. In the interim, the

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following summary of the meeting should give some flavor for the event.

Karen Fidler of Radian Corporation reviewed the proposals for the Committee. A copy of the overhead slides comprising her presentation are enclosed. Among other things, she stated that no new control technologies had been discovered, that enforcement of the standard was relatively straightforward except for the relief valve discharge provisions, and that a review by EPA's Cancer Assessment Group (CAG) indicated that the risk factor posed by vinyl chloride was considered the same as when the standard was promulgated. The proposed numerical limits for pressure relief device emissions were characterized as "consistent with the current standard." Mass-based limits, as opposed to numerical limits, were not chosen because a reliable calculation method had not been identified according to Fidler.

After her presentation, Bob Collom of the Georgia EPA asked several questions. In response, Susan Wyatt indicated that the reductions intended by the original standard have been achieved. Collom asked about the health impact of the existing standard and the effect of the amendment. Although this was not well answered by EPA, the staff indicated that the risk had been calculated at 10^{-3} for pre-standard exposure versus a 10^{-6} risk after regulation. Prior to regulation, 11 cancer-associated deaths were predicted with less than one predicted afterwards.

Another question concerned the impact of changing the reporting period from 10 days to quarterly. Mr. Collom was concerned that this might de-emphasize the need for corrective action. Throughout this presentation and later during the industry presentation, his concerns were addressed and he appeared to be satisfied that this would not cause a diminishment of effort. When asked whether the numerical limits were looser or stricter than the current standard, Susan Wyatt indicated that the proposed amendments were "not stricter but the same." Jack Farmer also stated that industry had performed much better over the last several years.

Bruce Stiener indicated that he did not know much about the industry but thought that EPA's limiting the number of permitted emergency discharges seemed presumptuous. Susan Wyatt

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partially responded by indicating that there were certain steps that could be taken to minimize such discharges. This concluded all the questions by the Committee.

W.C. Holbrook commented on behalf of the Vinyl Institute. A copy of the comments is enclosed. After presenting his comments, Susan Wyatt indicated that several points, such as the definition of "in vinyl chloride service" and the option to destroy samples, could be fixed. There was some discussion concerning leak detection and ethylene dichloride (EDC) storage tanks which were not resolved. Jeff Shumaker of Radian asked if the headspace vapor in the EDC storage tanks had been measured for VCM concentration. W.C. thought this had been done and agreed to send this information and a description of the storage tanks in question.

W.C. then presented comments on behalf of B.F. Goodrich which complemented the prior comments on behalf of the Vinyl Institute.

Joe Ledvina spoke next. In addition to reinforcing several of the prior comments, he raised the incinerator bypass and the 24-hour slurry averaging issues. He also recommended that acts of God be excluded from calculating the number of pressure relief discharges.

John Barr made the last presentation. He mentioned the need to clarify the proposed language to account for multiple discharges from a single event, the need for a de minimis exemption for discharges of 100 lbs. or less, and problems with the leak detection recommendations. There was a fairly extensive interchange between members of the Vinyl Institute and the EPA staff, particularly Fred Dimmick and Bob Ajax, concerning the leak detection section. Ultimately, Jack Farmer suggested that the Vinyl Institute meet with EPA later to discuss this and other issues.

Of the 15 or 20 points raised by Institute and company comments, only three or four were discussed at the meeting. It seems highly advisable for the Manufacturing Practices Committee to meet with EPA in the near future to discuss EPA's intent and to argue for modification of the draft prior to its formal proposal by the Agency. An effort should also be made to assess the EPA promulgation schedule and encourage prompt action.

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If you have any comments or questions, please let me know.

Cordially yours,



Peter L. de la Cruz

Enclosures

cc: W.C. Holbrook
G. Baise, Esq.

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