

October 18, 1978

→ (WCL) Bill - Very good
To: [REDACTED]

cc: R. T. Kramer
G. E. Lewis
R. E. McElowney/P. B. Smith
P. D. Wegrzynowicz/R. J. Murawski
H. L. Wise/L. R. Hart

From: W. C. Young

Subject: GCA Technology Division Report for UCC Vinyl Chloride Facilities
South Charleston Plant

I telephoned Peter Schaul, Federal EPA, Region III, Philadelphia, PA to request additional time in which to reply to his letter, dated October 6, 1978, regarding business confidentiality claims for material contained in the subject report. He was agreeable to our taking additional time (Underlying reasons were obvious as our conversation went further along.)

I then brought up the apparent deficiencies listed by the EPA Contractor. After first agreeing with the one stating, 'we should develop a standard procedure for routine leak checks with portable detectors', I took issue with their criticism about:

- (1) gas standard calibration procedure
- (2) possible dilution of vent gases ducted to the steam plant for thermal incineration.

He apparently discovered (since the report was issued) that we had filed an equivalency/alternate method request for (1) above - which he said would be granted. He also apparently disagreed with the theory in (2) - in fact, he was convinced about the thermodynamics of our system from the date of his visit to the plant. Furthermore, we'll get a letter(s) soon approving our leak detection elimination program and equivalent methods. The only fuss he has with us is about (1) inadequate routine leak check procedures and (2) our definition of a leak. Consequently, we can expect approval to include those contingencies. This should come as no surprise to anyone, and, compliance will require minimal effort.

He informed me that we will receive another inspection, October 27, 1978, to confirm final compliance with the emissions standard. He will be accompanied by Surveillance and Analysis personnel from the Wheeling Office. These people will assume future non-enforcement duties associated with the standard.

He reiterated that we could have additional time to reply to his letter and that all designated confidential information by UCC would be deleted from the final report.

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UCC 104237