

ATTACHMENT B

Program for Compliance with EPA Emission Standards

December 18, 1975 EPA published the final revision of the proposed VCM standard. Finalization is scheduled for mid-1976. Clarification of the December revision should be complete by the end of the first quarter and we anticipate implementation discussions with each plant at that time. In the meantime, planning at each plant should go forward under the following guidelines:

1. Designate a team within the plant consisting of, but not limited to, the environmental engineer, the production manager or product manager, the plant statistician, and the chief chemist to study and analyze the proposed standard ~~when published in mid-November.~~
2. Determine which current emission sources are likely to be in compliance with the standard. For such sources, perform compliance testing consistent with the procedures and requirements specified in the standard.
3. Determine the emission sources considered not in compliance with the proposed standard, and prepare a testing waiver request for each source.
4. Develop a leak detection and elimination program consistent with the requirements of the proposed standard. This program will need to be specific for each plant and specific to various areas within each plant.
5. Develop a Standard Operating Procedure to be a part of the leak detection and elimination program.
6. Statistically determine for each area of a plant in vinyl chloride service the normal background vinyl chloride concentrations and what levels should be designated as leak levels.
7. Develop a Standard Operating Procedure for opening equipment including reactors, loading and unloading hoses, etc.
8. Prepare compliance deadline waiver requests for all emission sources not expected to be in compliance within 90 days after promulgation of the final standard (approximately August 15, 1976).
9. Develop statistical data necessary for securing EPA approval for reducing stripped resin testing requirements, reactor opening testing requirements, other equipment opening testing requirements, etc.
10. Determine means of and time required for installing equipment to meet stripping requirements, reactor opening requirements, recovery system emission requirements, continuous source emission requirements in the EDC and vinyl chloride plant, etc.
11. Equip new pumps, agitators, and compressors in vinyl chloride service with double mechanical seals or equivalent.
12. Develop a program for equipping existing pumps, agitators, and compressors in vinyl chloride service with double mechanical seals or equivalent.

12/31/75

W. C. Holbrook - T. R. Linak

NGC37876