



INTER - COMPANY AND OFFICE CORRESPONDENCE

Form B316(4)

J. C. Lunn

TO: M. D. Owens

DATE: October 2, 1989

FROM: J. C. Lunn - OCT 03 1989

BY/REPL: Engineering JCL

ADDRES:

SUBJECT: VINYL INSTITUTE MEETING HIGHLIGHTS
HEALTH, SAFETY AND ENVIRONMENTAL COMMITTEE
BOSTON, MASS. - SEPTEMBER 27, 1989

TELEPHONE:

1. Peter De La Cruz, V.I. Counsel, reviewed the status of the SPI/VI action against OSHA concerning the 1 PPM 8 hour TWA EDC standard.
 - Cartridge respirators are allowed for compliance with the standard at this time. VI legal action is awaiting movement in the federal courts.
2. Several companies are having problems disposing of F024 waste streams. Many companies (Vista, PPG, Dow) classify coke from their furnaces and some other streams as F024. An EPA document has stated that ALL VCM producers in the U.S. generate F024 waste, however, some companies such as BFG and BCP do not classify these waste as F024. A work group will be set up with all companies participating to review this issue.
3. Peter De La Cruz also circulated his letter of September 14, 1989, discussing the EPA land ban of F024 waste and concerns that waste water isn't clearly excluded (copy attached).
4. Meredith Scheck, VI Assistant Director, commented on the Acute Hazardous Events data base prepared by an EPA contractor. This data base includes both VCM and PVC fire incidents. The VI had commented to EPA that including PVC was not appropriate since PVC is not toxic. The information is still included in the data base, however, at this EPA is not utilizing it. No VI action is needed at this time.
5. The VI made comments to the California Air Resources Board on their draft report on VCM exposure from landfills. No VI action is needed at this time.
6. The long awaited revisions to the VCM NESHAP standard, which were negotiated by the VI/SPI, have been proposed by EPA in the September 21, 1989 Federal Register. All VI concerns were incorporated and the VI will go on record as supporting the changes. Changes included exclusion of crude and product EDC tanks, allowances for flaring of relief valve discharges, and a statement that relief valve discharges do not result from leaks through the relief valve (copy attached).

BOR 009078

BOR-009078-00

BFG62056

25619203

Vinyl Institute Meeting Highlights
Boston, Mass - September 27, 1989
Page 2

7. The SARA Form R survey was tabulated for VI members and is attached. A comment from Shintech (PVC producer) stated that the majority of their fugitive emissions come from the water in their gas holder seal area. John Young, Shintech, stated that he has been questioned by the state of Texas as to why their fugitives are so high and others are not. He recommended that other plants review this source. The VI HSE committee may form a group to share knowledge in the reduction of fugitive emissions.
8. Joe Ledvina, Vista, reported on the TCLP current status. He said that the following waste may be hazardous because of the new TCLP standard.
 - PVC; PVC Scrap
 - Burnable Liquids
 - Waste Water
 - Excavated Soils
 - Recovered Groundwater

The standard is expected to be finalized in December, 1989 and become effective in June, 1990.

(JCL comments: Leakage of groundwater into open ditches could make a system hazardous. RCRA permitting would have to begin by June, 1990 if BCP isn't out of the ground with possible hazardous streams [PVC pond]).

The status of the various PVC plants with regard to their settling ponds is as follows:

Shintech - Has not found VCM above 200 PPB in their clay lined pond. Do not think they have a problem at this time.
Vista - Pond is concrete lined and meets definition of a tank, thus they may be exempt from this regulation.
BFG - Use various clarification methods of separating PVC and now go to above ground tanks. (BFG notes that fugitive dusts that settle in stormwater drainage areas may be a problem.)
Oxychem - Still studying the problem, leaning toward clarification with above ground storage.

9. Legal Action:

Oxychem, Addis, Louisiana recently paid the La. DEQ \$3,000 for a single 1988 relief valve discharge.

BCP, Geismar has received a \$1,000 penalty notice from DEQ for a single 1988 RV discharge.

BOR 009079

BOR-009079-00

BFG62057

25010201

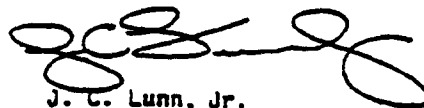
Vinyl Institute Meeting Highlights
Boston, Mass. - September 27, 1989
Page 3

10. Waste Minimization Topics:

- PPG - Charles Parnell reviewed the PPG quality team that was set up to reduce waste water. The team was set up along "Crosby" guidelines.
- BCP - Cris Lunn reviewed the recycle of heavy ends at the Geismar site. Stress was placed on recycle of anhydrous HCl to the original production process and that other streams are routinely recycled within a typical VCM plant system (BFG commented later that they also recycle at Calvert City [Catox unit] and have letters from the agencies that concur with their position).
- Vista - Frank Jeanson discussed bagging techniques to provide an accurate measure of fugitive emissions.
- Dow - Jim Turner discussed Dow's patented high efficiency stripping technology to remove waste water contaminants down into the low PPB levels. Jim stated that very few stripping systems will allow discharge levels in the low PPB range. Copies of the two papers reviewed by Jim are attached.
- BFG - Jim Lewis reviewed the BFG program for reducing waste such as drums, bags, pallets, etc. by installing bulk storage and requiring returnable containers where practical.

Official VI minutes will be distributed when received.

The next meeting of the VI Health, Safety and Environment Committee will be held in January, 1990. In addition, the safety subcommittee will also meet in January or February to plan the next safety workshop.



J. C. Lunn, Jr.

JCL/daa

cc: J. P. Leonard
P. F. West

J. L. Russ
G. T. Hennings

R. E. Berg
H. J. Accardo

W. B. Barton
M. Thorsen

BOR 009080

BOR-009080-00

BFG62058

25019205