



26 - SPI - EPA Technical Committee

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

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Chemical/Plastics
Administration

Mr. John R. Lawrence
Technical Director
The Society of the Plastics
Industry, Inc.
355 Lexington Avenue
New York, New York 10017

10/28/76

Dear John:

At our meeting with you and other members of SPI on September 9, 1976, we agreed that, if individual companies submitted additional data to us on their research and development facilities, we would reevaluate the emission limit for these facilities included in the vinyl chloride standard. Following the meeting we received letters from B. F. Goodrich Chemical Company, Air Products and Chemicals, and General Tire and Rubber Company.

The primary argument presented by SPI at the September 9 meeting against the 10 ppm limit is that separate control systems for research and development facilities are not cost-effective. The basis of the vinyl chloride standard is best control technology, not cost-effectiveness. In defining best control technology, we did exclude technology for which the costs were "grossly disproportionate" to the emission reduction achieved. By this we meant ridiculous costs which were not affordable by the industry and which would result in widespread plant closure. We also decided not to require incineration of the emissions from the oxychlorination process due to the energy expenditures that would be involved. It is emphasized that this decision was based on energy considerations rather than monetary considerations; we believe that incineration of these emissions is affordable by the industry.

It should also be pointed out that the standard recommended by B. F. Goodrich is even less stringent than the standard recommended by SPI. B. F. Goodrich states that it could not meet SPI's proposed limit of 0.05 lb/lb vinyl chloride charged unless the limit were expressed as a 30-day running average. B. F. Goodrich also suggested that the 0.05 lb/lb limit be applied only to reactors, strippers, monomer recovery

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systems and miscellaneous vessels rather than to the entire research and development facility. This would also be a less stringent limit than the one proposed by SPI.

Furthermore, in your letter dated September 13, 1976, it was stated that some members of SPI prefer the 10 ppm limit and request that the standard not be changed.

In summary, we have carefully evaluated the information contained in these three letters and your letter of September 13, 1976, and have decided not to revise the 10 ppm emission limit specified for research and development facilities. The vinyl chloride standard is based on best control technology that is both available to and affordable by the industry. All data available to us indicate that the control technology required by the standard is both available and affordable, and a revision in the standard is not justified.

I appreciate the cooperation shown by you and the members of the industry in supplying us with information so that we could more fully evaluate this subject.

Sincerely yours,

Original Signed By Don R. Goodwin

Don R. Goodwin
Director
Emission Standards and
Engineering Division

cc: John Barr
W. C. Holbrook -
✓ Robert Landrie

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