



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

AUG 26 1982

Mr. G. P. Munger
President
The Society of the Plastics
Industry, Incorporated
355 Lexington Avenue
New York, New York 10017

Dear Mr. Munger:

This is in response to your letter of July 12, 1982, to Don R. Goodwin, in which you suggested several amendments to the vinyl chloride standard. We appreciate your suggested amendments as well as your detailed written comments on the draft review document. Both efforts represent considerable thought and careful deliberation.

I apologize for the length of time it has taken to respond to your letter. I have talked to Mr. Peter de la Cruz on a couple of occasions concerning your letter, and explained to him that I needed to coordinate the views of several members of the EPA working level vinyl chloride project team before responding to your letter. Several of these people, including myself, have taken vacation time over the last month, which has made coordination more difficult.

Each of the amendments you have suggested is addressed below. Where appropriate, we have described additional information we need to more fully evaluate your suggestion. As I explained to Peter on the telephone, we hope that providing a list of our information needs will make any subsequent meetings more meaningful.

(a)(1) Use of the term "malfunction" in place of the term "emergency" discharges

We considered the "malfunction" concept when we originally proposed the vinyl chloride standard. On the surface, the definitions of "malfunction" and "emergency" discharge may appear similar. However, conceptually, they are different. Although the term malfunction may mean different things depending on the regulated industry, in general it refers to periods when emissions in excess of a numerical emission limit occur and the owner or operator has performed all the routine maintenance that can reasonably be expected on a control system. In the case of vinyl chloride relief valve discharges, the concept of malfunction does not readily apply because we are concerned with much more than routine maintenance on a control system; we are concerned that plants adopt control methods and technologies to prevent the discharges. That is, we are concerned with the adoption of controls, not just the maintenance of controls already required by other parts of the standard.

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(a)(2) Exemption of discharges less than 100 pounds, that occur less than once in 2000 batches

We are interested in further discussing this suggested amendment. In evaluating this suggestion, it would be helpful to know what problem this exemption would solve; i.e. what is the motivation for this exemption? Are you aware, for example, of cases where plants with discharges smaller and less frequent than this are being cited in violation of the standard? If we were to adopt the cut-offs you have suggested or similar cut-offs, we would need some reasons for selecting these numbers and we would need to describe the emission impact of allowing these discharges. What are the bases for your selecting 100 pounds and one discharge per 2000 batches? This appears to be biased in favor of plants with large reactors, but I assume you have taken this into account. We would be interested in some examples of at least two "typical" plants, one with large reactors and one with small reactors and how often the two-thousandth batch would occur at each plant type.

(b) Weekly Span Check

A weekly, rather than daily, emission monitoring span check does seem less burdensome. However, the emission testing experts on our team do not perceive daily span checks as taking a long time. Therefore, more information on how long it does take would be useful. Perhaps time is not your concern, in which case we would be interested in knowing more about the problem you would like to resolve. We would also be interested in any data you may have which would enable us to compare monitor reliability with daily span checks versus weekly span checks. In other words, if we changed the frequency of monitor calibration to weekly, how much reliability would be lost?

(c) Exception Reporting

We agree with you that changing the semi-annual reporting requirements so that only excursions above the stripping operation and reactor opening loss standards are reported would improve the standard. Records would need to be filed for all measurements, but reporting only exceedences would reduce the reporting burden on the industry and EPA without sacrificing effective enforcement.

(d) Daily Analytical Compositing of Stripping Samples

In principle, we consider daily analytical compositing of stripping samples reasonable because the stripping standard is based on a daily average. However, an analytical procedure would have to be developed and tested before we could approve composite sampling as an alternative test method. Perhaps you have already developed such a procedure. The procedure would need to consider, at a minimum, the quantity of resin produced during each stripping operation (i.e., the average would need to be a weighted average), sample mixing problems, and losses of vinyl chloride from the sample overtime. The procedure would also have to be standardized and reliable. If you have developed a procedure for composite sampling and have done comparative testing between that procedure and Method 107, we would be happy to review

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the procedure and data with the goal of publishing that or a similar procedure in the Federal Register as an approved alternative method.

(e) Less frequent reporting of discharges less than 100 pounds

We agree that, if we adopt your suggestion in (a)(2), semi-annual reporting rather than 10-day reporting of such discharges would be appropriate. In fact, we are currently planning to change the 10-day reporting to a less frequent report for all discharges of any size.

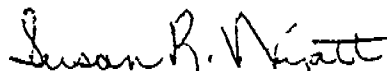
(f) New source permits

We are presently reviewing the general provisions of 40 CFR Part 61. In this review, we are considering a provision to allow operators to submit reports drafted for other State or federal requirements. The reports, however, would have to contain the information required in the General Provisions and the vinyl chloride standard. The Clean Air Act, at least implicitly, requires EPA to make specific decisions concerning sources of hazardous air pollutants. Our approach would allow an operator to reduce a plant's reporting burden by sending copies of reports drafted for other purposes. Because we believe reports drafted for other State or federal requirements will usually contain the information required by the General Provisions and the vinyl chloride emission standard, this approach should reduce the burden on operators to a reasonable level. Operators could simply send a duplicate report to EPA. Does this approach resolve your concerns about permits under the vinyl chloride standard? If not, we would appreciate more information about your concern.

After you have had an opportunity to review the positions and questions of the EPA vinyl chloride project team, we would be happy to meet with you and members of the Society of Plastics Industry, Inc. (SPI), if you like, to discuss further your suggested amendments. The purpose of the meeting, as we see it, would be to exchange ideas and information at the working level; i.e., the EPA management and decision makers would not attend this particular meeting. If you or some of the members of SPI would like to attend such a meeting, please contact me or Fred Dimmick at (919) 541-5578.

Again, I appreciate very much the time and thought you and other members of SPI invested in the suggested amendments, and apologize for the amount of time I spent in responding to your letter.

Sincerely yours,


Susan R. Wyatt
Chief

Regulations Preparation Section

cc: ✓ Peter de La Cruz, Keller and Hackman