

- 4) The requirement that all VCM relief valves be tied into a manifold leading to a flare stack would be impractical. We feel that equivalent control could be obtained by other methods and feel that discretion should be allowed. A fair amount of natural gas would have to be constantly burned in the flare. In our area, our gas supplier is refusing to allow any new gas hookups for any reason.
- 5) Polymerization reactor relief valves should not be manifolded together. This is an extremely dangerous practice. These manifolds would plug up with solids and deprive the plant of any protection. Tying reactor relief lines into a gasholder is equally dangerous. The sudden surge of gas from a relief valve would almost certainly result in the release of VCM to the atmosphere, which could lead to a catastrophic explosion. There is no PVC producer who has reactor relief valves tied into a gasholder.
- 6) Canned pumps depend on the fluid being pumped to lubricate the pump and motor bearings. They are totally impractical when used with a nonlubricating fluid such as vinyl chloride. The bearings fail very quickly and the motor rotor usually ends up gouging into the stator, a dangerous situation with a highly flammable material like vinyl chloride.

Retrofitting pumps with double mechanical seals are expensive but are a proven practical solution.

- 7) Effective date of the regulation is proposed to be January, 1976.

We have a number of vents which will have to be treated. It just is not at all possible to design systems, obtain equipment, install and test by that time. Most equipment deliveries today are running over one year.

- 8) In this very short period of time since we obtained this EPA document, we have not been able to come up with any ideas on how we would strip VCM from our water effluents and then capture or destroy the VCM. This might be straightforward, or very difficult. We strongly suspect that the time required to investigate, design, procure, and construct such a system would take much longer than the time allowed.