Air Products

B. Reporting

Provide reporting by exemption, and extend averaging time for reactor opening and RVCM.

C. Malfunction

Provide a malfunction clause similar to that proposed for benzene emissions.

D. Leak Detecter System

Wait to see what EPA proposes in other rulemakings. Reduce records and frequency of calibration.

E. Permitting

Require permits only for the more strict of BACT (or LAER) under SIP and the NESHAP.

Items not to be addressed at this time include recordkeeping and RVCM levels.

Comments are invited from the recipients of this memo on these points, and on draft wording which will be circulated in a few days.

Other points include:

- Most companies are not reporting VC releases within the process and CERCLA. Laundrie of General Tire has a letter from Region V specifically approving this decision.
- We agreed that if any company received a Sec. 114 request we would notify Counsel and discuss the letter before an answer is submitted.

J. T. Barr

JTB/sjw

Air Products and Chemicals, Inc.
Box 538, Allentown, PA 18105
(215) 481-4911

29 September 1982

Dr. C. Cella
Montipolimeri
Direzione E Uffici
Via Moscova 3
20121 Milano
ITALY

Dear Dr. Cella:

I am sorry that you were not at Toronto. We had a good meeting, even though it rained all week. There were 48 people there, from most of the usual companies.

I enclose the outline which I used for my regulatory summary. Little has changed with the phthalates since I last wrote you. The National Toxicology Program is starting an extensive study on the esters and the alcohols, but it will be a while before they are complete.

I hope to see you next year in New Orleans.

Very truly yours,

John T. Barr
Manager, Regulatory Response

JTB/sjw

Enclosure

Update on Regulatory Status

EPA

Vinyl chloride standard revisions under discussion with SPI.

OMB approved change to semiannual reports.

Additional suits filed and Sec. 114 letters sent on emergency emissions.

PMN exemption policy excludes VC, etc.

Study of emissions, including VC underway in Harris Co., Texas.

Superfund reporting limits in revision, VC may stay at 1 lb.

Revised Test Methods 106 and 107 published 7 and 8 September.

OSHA

Comment period is closed on proposal to reopen the cancer policy - action next year?

Comment period closed on revision of medical record retention rule.

Labeling rule not expected until mid-83.

Noise standard generally in effect.

Respirator rule comment period over.

VC Training Film now available from National Audiovisual Center.

Voluntary programs now in pilot phase.

FDA

Promised action on 1975 PVC proposal this October.

Constituent policy comment period closed.

No action on plasticizers - more tests.

Others

Unpublished report suggest tumors from VAc exposure.

Peroxides cause skin tumors in an 8(e) report.

TCE bioassay being reviewed this month.

States

Many have own labeling, wastes, etc. rules.