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October 31, 1978

Joseph E. Hadley, Jr., Esquire
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Suite 1000
1150 17th Street, N. W.
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Re: Relief Valve Discharges By Facilities
Covered By The National Emission
Standard For Vinyl Chloride

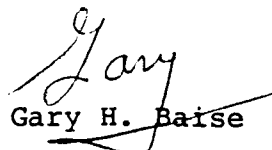
Dear Joe:

Enclosed is an October 26, 1978 memorandum by the Division of Stationary Source Enforcement of the U. S. Environmental Protection Agency advising the Agency's regional enforcement offices (1) that relief valve discharges due to operator error should be considered to be violations of the Vinyl Chloride Standard only when they resulted from preventable operator errors, and (2) that such discharges should be reviewed on a case-by-case basis. The memorandum is limited to discussing operator error, and does not specifically address broader questions of preventability, such as backup equipment and the preventability of discharges resulting from equipment malfunctions.

The remaining questions for the PVC Safety Group are whether SPI should seek further clarification from the Division of Stationary Source Enforcement and the staff at Research Triangle Park (RTP) concerning: (1) what types of operator error will be considered "preventable", and (2) what types of equipment failures and malfunctions will be considered "unpreventable" and how such determinations will be made.

Accordingly, we suggest John Lawrence consider polling the members of the PVC Safety Group to determine whether they favor SPI approaching the staff on these matters or would prefer to deal with the regions on the remaining questions as individual cases arise.

Cordially,


Gary H. Baise

SPI- 12579

Enclosure