We would not mislead the EPA to suggest that this is the only alternative for control of the slurry blend tank vents. Speculative designs have been proposed for storing unstripped slurries in atmospheric tanks without a normally operating vent. The investment would be substantially less than the range above, but the emissions would not be affected substantially because again the contained monomer would for the most part be released in the dryer. We regret the use of qualitative terms in describing the affect on emissions. Due to other priorities, specific data on relative quantities vented is limited and questionable, especially with regard to sampling and analytical procedures. Direct data is not available because installation of control systems is incomplete. Although substantial effort toward calculation of emissions has been attempted, we would be reluctant to testify to their accuracy without commercial scale data for verification.

We also suggest that the slurry blend tank vents are a critical control area for compliance with a very stringent OSHA regulation. We do not anticipate elimination of routine visual level verifications in existing plants; the technology is not known. One alternative for protection of operating personnel is to collect the vents which must then be dispersed. Substantial investment has already been allocated for such systems. Add-on controls would require substantial additional investment. The preferred alternative would be to install the system to eliminate the normally operating vents and divert the emission to the dryer. Here again, we find that we achieve very little in benefit, but substantially complicate the operability of the plant.

Another most important factor for consideration is the resulting intrinsic safety of the process after control revisions. An induced-draft tank vent system can be designed to preclude the existence of flammable mixtures in the slurry blend tanks. Add-on control devices for induced-draft systems are substantial more expensive than for natural draft systems, but the natural draft system would not necessarily prevent the formation of flammable mixtures. In addition, a central add-on control device would through connecting lines subject all slurry blend tanks to a fire should it occur in one. An induced-draft system would preclude this disastrous potential.

We also have comment on Exception (c)(7) in Paragraph (c)(6). Paragraph (c)(7) refers to relief valves "in vinyl chloride service." We suggest that by definition no vessel following the stripper is "in vinyl chloride service." The stripper itself is border-line depending on whether the RVCM contained in the water phase and in the solid PVC is considered "in the liquid state." This comment also applies partially to Exception (c)(9), in particular to: (i), (ii), (iii), (iv), and (vi).

The remainder of Paragraph (c)(9) is expected to add little to the control of emissions. We would not expect to encounter any violation of (c)(9)(v) or (c)(9)(viii) after the slurry has been stripped to less than 400 ppm. We suggest that (c)(9)(7) applied to vessels following the stripper would also produce very little in terms of emission reduction but could contribute substantially to the costs of administering the regulation.

We suggest that the EPA consider the 400 ppm in slurries in the same manner as OSHA has set a no-action level at 0.5 ppm. We feel that these levels are likely to be consistent especially downstream of the dryer. Specifically, we suggest that Paragraph (c)(6) be revised to delete the exceptions and the remainder to be reworded to give a no-action level. Then, we as an industry can work toward a goal that will achieve the EPA's target on emissions and eliminate the substantial costs of continuing monitoring.

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