

March 23, 1977

To: Mr. J. L. Worstell

cc: Mr. T. D. Epps
Mr. C. E. Fry
Mr. R. E. George
Mr. W. T. Gray
Mr. L. R. Hart
Mr. G. D. Hutcheson
Mr. R. T. Kramer
Mr. R. E. McElowney
Mr. J. C. Nelson
Mr. L. W. Phair
Mr. P. B. Smith
Mr. D. C. Vickery
Mr. R. N. Wheeler
Mr. H. L. Wise

From: W. C. Young

Date: March 23, 1977

Attached are minutes of the most recent (PVCCSTM) Team meeting, held on March 18, 1977.

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Attachment

UCC 105338

PLANT VINYL CHLORIDE COMPLIANCE STATUS MONITORING TEAM

MEETING MINUTES

Date: March 18, 1977

Present

R. E. George
L. R. Hart
G. D. Hutcheson
D. C. Vickery
W. C. Young

Absent

P. B. Smith

Discussion Items:

1. In accordance with the plant compliance schedule and conditions set forth by the Region III EPA Administrator, notice of progress made regarding Continuous Emission Monitoring, Point Source #003, was forwarded to the EPA, February 18, 1977.
2. Pre-approval for funding emission control projects at the Bulk Terminal in North Charleston still has not been received. A "30" order was opened for the express purpose of purchasing necessary component parts and to avoid delay in meeting the first increment of progress in compliance schedule.
3. Pre-approval has been received for funding similar projects in the Solvent Vinyl Resin Department.
4. Compliance status notices will be submitted to the EPA within 10 days for Point Source Nos. 004 and 005 (Reciprocating compressors @ No. Chas.) (Reciprocating pumps @ SVR)
5. The next milestone in the compliance schedule (March 31, 1977) is in jeopardy due to EPA's lack of response or indecision regarding UCC's requested approval of a proposed equivalent control method for leakage from relief valves. EPA has stated that if the equivalency is approved, UCC will be required to submit new increments of progress for these sources to reflect the shorter time required. It would seem that the delay by EPA is approaching the point of rendering moot our claim of shorter time required to meet compliance. Moreover, the delay is approaching the point that it will become necessary to submit a new schedule, regardless of EPA's decision. It is sad, but true, that all of industry is legally bound to full compliance within a two year period, beginning on 90 days from the effective date of the standard. The EPA has authority only to approve changes to intermediate milestone dates of compliance schedules—not the final completion date.
6. Mr. D. C. Vickery has agreed to serve on the PVCCSM Team and to assist where Maintenance support/efforts are necessary.
7. The first "second increment of progress" date on our plant compliance schedule is April 1, 1977. This is the date of initiation of on-site construction or installation of continuous Emission Monitoring equipment at the Island Powerhouse. The Engineering Job Package for this project is complete and will be issued next week.

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8. Our compliance schedule includes 19 Point Sources and 76 progress/completion dates. We are required to notify the EPA in writing no later than 10 days after each increment has been attained. Since a number of dates are the same for different sources the total number of written notices is forty nine (49). (Talk about controlling and MOP!) Each notice must be sent by registered mail which will amount to \$109.27 for postage alone-another product of government bureaucracy!

9. Next meeting date: April 1, 1977

Place: Bldg. 406-1

Time: 1:30 p.m.

UCC 105340