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July 14, 1983

To: SPI Vinyl Institute
SPI Vinyl Institute Manufacturing
Practices Committee
SPI Vinyl Institute Legal Committee

Re: EPA Review of the Vinyl Chloride Standard

Ladies and Gentlemen:

Enclosed is a draft letter to the Environmental Protection Agency (EPA) suggesting changes to the relief valve discharge provisions of the vinyl chloride standard. The letter follows a May 26 meeting with EPA and a June 20 meeting of the Manufacturing Practices Committee. The minutes of that meeting are also attached.

The main feature of the draft letter is the suggestion that facilities be required to submit a relief valve discharge elimination plan to EPA detailing the training, maintenance, written procedures and other action the facility will routinely follow to prevent relief valve discharges. Following approval of a plan by EPA, a source would be deemed to violate the relief valve discharge provisions only if it fails to comply with its plan. EPA would retain authority to require revisions to the plan if a facility's history of relief valve discharges indicates to the Agency that additional preventive measures are needed.

The Manufacturing Practices Committee's current plan is to finalize the letter at its August 4, 1983 meeting. We would appreciate your sending comments through your representative on the Manufacturing Practices Committee. If that is not feasible, please contact us with your comments by August 3. In particular, we are requesting additional case histories like those in the enclosed draft letter (pages 10-12).

The EPA staff at Research Triangle Park indicated that an internal EPA working group meeting is tentatively scheduled for August. We hope to submit the letter in early

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August so that it may be considered during that meeting. Prompt submission of any suggestions is also desirable in light of the recent District Court decision declaring the relief valve provisions of the standard unenforceable. While EPA has not determined whether it will appeal that decision or repromulgate the standard, it behooves us to act quickly in the event that the Agency decides to proceed with repromulgation.

While working on the draft letter to EPA, one research area was the cost imposed by the standard. In the past we have referred to a 1979 EPA report to Congress (copy enclosed). We recently obtained from EPA an updated draft report being prepared by Development Planning and Research Associates, Inc. A copy is enclosed for your review and comparison. One peculiarity is an assumption of zero investment costs after 1981. EPA is checking with the contractor on this point.

I look forward to seeing you on August 4 and 5. In the interim, if you have any comments or questions, please feel free to contact us.

Cordially yours,


Peter L. de la Cruz

Enclosures