

INTER-OFFICE CORRESPONDENCE

CONFIDENTIAL MEMO

To C. J. Kleinert

NAME

LOCATION

Date September 29, 1981From J. A. King

NAME

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Subject Future Revision of the VCM StandardHooker
Chemical

PLASTICS DIVISION

RECEIVED

OCT 5 1981

D. M. CONNOR

Copy to: F. F. Hoy

Copy for circulation to PVC Plant Mgrs.
Messrs. D. M. Connor and H. Dubec

At the VCSA meeting on September 24, 1981, Mr. G. Baise of Beveridge and Diamond (Washington, D.C. law firm) presented his best understanding of this subject. He asked all members to keep his remarks confidential in order to protect his friendly sources in EPA.

The Phase I TRW report to EPA on the current status of compliance by the industry is now largely discredited by EPA and will be shelved. TRW's contract for future study phases has been terminated.

Now, if EPA decides that VCM emissions pose a true health hazard, EPA itself will address a Phase II, which is a determination of how to tighten the standard. This exercise is a few years away, at least, if it comes about at all. The worst cases would be application of BAT, Best Available Technology, and even stricter measures beyond BAT, if these were needed. No one seems to believe a health hazard will be found beyond what is already known and under control.

Therefore, concerning the current standard EPA will probably:

1. Not change the limits of 10 PPM for point sources and stripped waste water nor the 400 PPM and 2,000 PPM for stripped resins.

Gas holder seal water will not come under regulation.

2. Will require standardization of the various alternate methods already approved for reactor opening.
3. Will revise test method 107 to reduce lab work.
4. Will require some Leak Detection and Prevention Programs to be tightened up to conform to what is considered the "best" program in being.

However, a fixed point area monitoring system will not be required.

5. Will make some administrative changes to make life somewhat easier for the industry.

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Future Revision of the VCM Standard (Con't.)

6. Will allow some lenience for malfunctions.
7. Will clarify the definition of Emergency Relief Valve Discharges.
However, EPA will continue to take a close look and firm stance on these.
8. Will not regulate landfill emissions.
9. Will look closer at maritime and truck terminal storage.
10. Will not regulate PVC fabrication operations.
11. Will look at VCM emissions from the pesticide and trichlorethane industries.

Finally:

- A. EPA has or will withdraw the 1977 proposed amendments to the standard which came about largely because of pressure on the court by the EDF (Envir. Defense Fund).
- B. EPA has abandoned the concept or goal of ZERO DISCHARGE.
- C. Industry has friends in EPA who believe that it has done a good job under the standard and that it is time to say "enough".

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