

Occidental Chemical Corporation

September 22, 1986

EPA RCRA Docket (S-212)
U.S. EPA (WH-562)
401 M St. SW
Washington, DC 20460

Re: Docket F-86-TC-FFFFF

Dear Sir:

I am commenting, as Plant Manager of the Occidental Chemicals Corporation, Burlington South Facility, which was acquired from Tenneco Polymers, Inc. in May, 1986. Listed below are some of my own comments on the proposed Rule (40 CFR, Parts 261, 271 and 302) as was noted in 51FR21648.

In addition to these comments, please take notice that I fully support the comments submitted to you by the Chemical Manufacturers Association and the Vinyl Institute, a Division of the Society of Plastics Industries.

As Manager of a manufacturing facility producing polyvinyl chloride and their compounds, my comments will be limited to that part of the proposal pertaining to vinyl chloride.

Manufacturing facilities of vinyl chloride and polyvinyl chloride are already heavily regulated. There is the 29 CFR 1910.1017 OSHA Standard, the NESHAP Standard 40 CFR 61.60. The Clean Water Act, The Safe Drinking Water Act and The Toxic Substances Control Act rounded out by FDA Regulations on food contact applications (51FR4177).

An Agency review of the NESHAP Regulations shows data indicating that actual emissions from PVC facilities are only about 10% of the permissible emissions. This facility is no exception; our actual emissions are a small percentage of the permissible emissions under NESHAP. In addition to the drastically reduced residual vinyl chloride level in polyvinyl chloride, which was achieved by the introduction of sophisticated stripping methods, the NESHAP requirements also call for vinyl chloride removal from the process water. The limit under this Standard is 10 ppm in the contact water stream. Our stripped water contains less than 1 ppm. The water leaving the wastewater treatment facility reveals an average residual vinyl chloride level of 10-20 ppb.



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PVC Resins and Compounds

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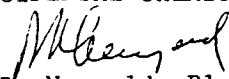
For more than fifteen years, our Wastewater Treatment Plant sludge and quantities of waste polyvinyl chloride were disposed of in our on-site landfill. Groundwater monitoring data collected since 1984 from wells surrounding the landfill indicate the total absence of vinyl chloride in the groundwater. About one-third of the materials landfilled were deposited prior to NESHAP Regulations where slightly higher residual vinyl chloride levels were the rule. This indicates that polyvinyl chloride landfilled with residual vinyl chloride levels around 100 ppm seem to have no leaching effect to the groundwater.

It seems to me to be rather counterproductive to regulate a substance such as vinyl chloride even further when all existing regulations put a stringent control on the emissions and discharges of this material. Furthermore, the proposed effluent guidelines for the OCPSF industries require the application of Best Available Technology (BAT). For aqueous streams containing vinyl chloride, EPA defines BAT as secondary biological treatment. Why then regulate this stream further if from data generated under any one of the above cited standards, it can be demonstrated that BAT was applied.

When considering which wastes need further regulation as hazardous wastes, EPA should control those wastes which are non-treatable or interfere with the regular treatment systems resulting in the discharge of toxic levels. This, of course, is already prohibited under the NPDES requirements.

I thank you for the opportunity to comment on this proposal.

Yours truly,
OCCIDENTAL CHEMICALS CORPORATION


R.R. Neugold, Plant Manager

RRN/jst

bcc: F.W. Kanzler
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