

Wey

Telephone Conversation
Abe Ferdas (EPA Region III Philadelphia)
to J. L. Worstall - March 22, 1977

- 1) Mr. Ferdas told me that he had received a call from C. G. Beard regarding the release of VCM of March 20, 1977.

Mr. Ferdas did not give details, but apparently Mr. Beard was very unhappy about the situation.
- 2) Mr. Ferdas requested that the incident be handled under section 61.65 of the regulation, and requested that I send in the required report within 10 days. I agreed, but I repeated my comments of March 21, i.e., a rupture disc is not a relief valve, and this was not an emergency in the sense that the reaction was not under control.
- 3) I also repeated R. N. Wheeler's efforts to get the language of the regulation clarified for this sort of situation last year; this effort was actually instigated by C. G. Beard's dim view of how the July 28, 1976 situation (a very large VCM release) was handled.
- 4) It seemed that Ferdas was doing this because of Beard, and that otherwise he would have left matters per the AF/JLW discussion of March 21, i.e., regard the release as a leak, and report it in the semi-annual report.
- 5) I asked Ferdas for clarification of the term "end date" with respect to waiver compliance schedules (the rupture disc equivalency question). Mr. Ferdas replied that he was referring to the end date for each individual rupture disc waiver request, not to the last end date in the entire schedule of all waivers. I expressed my concern over this, and informed him that we would request (in writing) a revised compliance schedule due to delays beyond our control, e.g., EPA's failure to come to a prompt decision on the rupture disc equivalency question.
- 6) I found out that Region IX had already denied the equivalency. They did this on their own, without waiting for notification from Washington. All other Regions are waiting on Washington. Ferdas indicated that we could expect a decision within a week or so. He did not know how Washington would rule.

JLW/pl
3/23/77

UCC 101595

cc: Mr. T. D. Epps
Mr. C. E. Fry
Mr. M. E. Griffith
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