

M E M O R A N D U M

TO: Joseph E. Hadley, Jr.
FROM: John B. Dubeck
DATE: April 9, 1980
Re: SPI-VCM/PVC Resin Producers Group

As you requested, I attended a meeting at Gary Baise's office on March 28, 1980, at which the EPA standard for vinyl chloride emissions was discussed with Robert Rauch and Larry Corcoran of the Environmental Defense Fund (EDF). Gary Baise and Scott Bowen represented Beveridge, Fairbanks, and Diamond. SPI members in attendance were John Barr, of Air Products, W.C. Holbrook, of B. F. Goodrich, and Nick Wheeler, of Union Carbide. As you know, EDF has been pressuring the Environmental Protection Agency (EPA) to further tighten the emission standard for VCM. At the meeting, we discussed EDF's areas of concern regarding the current standard and the industry's compliance therewith. While EDF was hardly converted to our cause, I think the meeting was quite fruitful and I got the impression that EDF was beginning to realize that some of its ideas for further reducing vinyl chloride emissions were totally impracticable. It was agreed that another dialogue at some time in the future would be helpful. Gary Baise said that he would be preparing a complete report of the meeting.

The first subject that was discussed was stripping of residual vinyl chloride monomer (RVCM). EDF stated that it had analyzed the six-month reports for 1977, 1978 and 1979, and that they thought it would be appropriate to reduce the stripping limit for suspension resins to 50 ppm and for dispersions to 500 ppm. Our members explained to EDF that many factors affected the level to which VCM could be stripped, including the intended use of the resin because stripping does consume part of the heat history of the resin. EDF suggested that subcategories could be defined with different stripping levels established at each subcategory. Our members explained that such subcategories would be virtually impossible to define and that any lowering of the 24-hour average stripping level would knock certain resins off the market, impose further hardships upon the scheduling of resin manufacture (it was explained that high RVCM resins must be manufactured at the same time as low RVCM resins so that 24-hour average is not exceeded), and that some plants of some manufacturers would be much more severely hurt by any lowered stripping level depending upon the nature and variety of demand or the output of that plant.

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The 10 ppm limit for process vents was discussed with EDF anxious to lower this limit since waste water stripping facilities were routinely achieving levels well below 10 ppm. It was explained that a 10 ppm standard requires that equipment be designed to operate at 1 ppm or less to ensure that excursions above the permitted level do not occur. Finally, it was generally agreed that the total quantity of VCM involved in the process vent streams was insignificant.

EDF was quite confused by the emergency relief valve discharges that are being reported. Some companies report many discharges while others have none to report. It was discovered during the course of the discussion that at least one relief valve discharge by B. F. Goodrich that was reported to EPA was not included in the data sent to EDF by EPA. It was explained to EDF that the number of discharges per thousand pounds will vary depending upon the size, age and number of reactors that a company has. Another point that John Barr emphasized repeatedly is that union work rules were responsible for a large number of relief valve discharges because properly qualified personnel could not always be assigned to critical tasks. EDF was anxious to impose some incentive that would encourage the elimination of relief valve discharges such as a graduated fine system. Our SPI members explained that more important than any fine is the fire and explosion hazard that accompanies a relief valve discharge. EDF may or may not have been convinced but a very strong case was made for the fact that it was not only impossible but extremely dangerous to attempt to collect relief valve discharges.

On the topic of fugitive emissions, the discussion became quite philosophical. From what I understood of the discussion, fugitive emissions are just not a problem in terms of the quantity of vinyl chloride that is emitted and that the EPA figures on this source of emission are outdated and inaccurate.

The final topic of discussion concerned offsets. Our members took the position that this was a dead issue. They maintained that VCM emissions were as low as they could be today although the general trend of decreasing emissions would continue gradually as technology became available but that basically, there was no significant source of emission easily controlled by new technology that could give rise to any usable offsets. It was emphasized that PVC plants must be able to locate next to VCM plants since the major risk involved in the use of VCM is in its transportation.

At the conclusion of the meeting, it was my impression that EDF would focus its attention on stripping and relief valve discharges since these represented the most significant areas for improvement. EDF reiterated that it would suggest the need for offsets in future communications with EPA. At this point, the members reemphasized the poor quality of EPA's data concerning fugitive emissions and urged that EDF consider excluding fugitive emissions from any policy that it advances concerning offsets.

For what they are worth, the notes that I took during the meeting are attached.



J.B.D.

Enclosure

cc: Lawrence P. Halprin