

ENVIRONMENTAL PROTECTION AGENCY

July 5, 1978

MEMORANDUM

SUBJECT: Vinyl Chloride Barge Loading
Mantua Terminals

FROM: Director
Division of Stationary Source Enforcement

TO: Marcus E. Kantz
Air Facilities Branch
Region II

This is in response to F. W. Glaccone's memo of May 25, 1978, requesting guidance on how to address vinyl chloride emissions from a barge loading facility at Mantua Terminals in New Jersey.

Based on the information presented in Mr. Giaccone's memo and subsequent telephone conversations with you, we have determined that neither the National Emission Standard for vinyl chloride nor the Prevention of Significant Deterioration (PSD) regulations apply to the change in the method of operation proposed by Mantua Terminals.

Vinyl Chloride Standard

The vinyl chloride standard applies only to plants which manufacture ethylene dichloride, vinyl chloride and/or polyvinyl chloride. Mantua Terminals is not engaged in any of these manufacturing operations and, therefore, is not subject to the vinyl chloride regulations.

Prevention of Significant Deterioration (PSD)

We understand from talking to Stu Roth (Region II Enforcement) that a PSD permit which covers Mantua's new refinery and certain associated storage and transfer facilities was issued recently by the Agency. As far as we know, the only modifications Mantua has proposed, since the issuance of that PSD permit, is the loading of gasoline into vinyl chloride vapor-containing barges, as discussed in Mr. Giaccone's memo. The potential increase in emissions estimated to result from this modified operation amounts to less

than 100 tons/year. Therefore, the modification is not subject to PSD preconstruction review at this point in time.

There are several enforcement options available to the Agency for addressing unregulated air pollutant emissions which may cause imminent and substantial endangerment to the public health. My staff is currently exploring the possibilities of initiating an emergency action under Section 303 of the Clean Air Act or Section 7 of the Toxic Substance Control Act to prevent hazardous emissions of vinyl chloride from Mantua Terminals. Ken Malmberg, of my staff, will be in contact with you regarding the availability of these enforcement options. Please contact him at ETS 755-7929 if you have any additional questions or if you can provide us with any additional information.

(signed by W. F. Johnson)

Edward E. Reich

cc: F. W. Giaccone
Mike Trutna
Susan Wyatt
Stu Roth