

Vinyl Industry Urges EPA to Ensure PVC Regulatory Controls Better Recognize Diversity, Variability of Industry

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The vinyl industry submitted comments to the Environmental Protection Agency today supporting proposed Maximum Achievable Control Technology (MACT) regulations for polyvinyl chloride (PVC) manufacturing but urging the agency to ensure the final rule better reflects the diversity and variability of the industry that makes the raw material used in a broad range of PVC products people rely on every day.

The comments seek to improve the proposal in a way that both follows the Clean Air Act and recognizes the complexity of PVC resin – the basic building block for PVC/vinyl products.

“The Agency’s proposal addresses the right issues and lays out a good framework, but the final rule should acknowledge that each PVC resin is carefully developed for a particular end use and the performance demands associated with that use,” said Allen Blakey, Acting President of the Vinyl Institute. “One resin can be so different from another that it is actually a different product, and should be regulated as such.”

Resin is mixed with other ingredients to give the range of performance properties required in everything from PVC pipe to vinyl packaging.

VI Technical Director Richard Krock noted, “There are more than 100 different recipes for resin. Different types and grades of resin involve different chemistries and require different types of processing equipment and operations, all of which affect product behavior and performance. The final regulation must reflect that.”

Additional VI comments addressed statistical calculations related to various emissions control devices and called for consistent test methodologies to set limits and measure compliance. VI also submitted historical data to expand the database supporting the proposed rule.

Comments were filed by other vinyl product groups and companies as well. Jerry Huntley, President and CEO of the Vinyl Siding Institute, noted that vinyl siding is warranted by most manufacturers for 50 years or longer and must retain certain physical properties for the length of the warranty. It is made on high speed lines that require a high flow compound to fill the die, yet higher resin inherent viscosity (IV) for impact resistance. Also tight color control is required for long-term weatherability and color retention as well as uniformity of look. She urged EPA “to carefully consider the impact of the proposal on the ability of the industry to supply resin grades” meeting the needs of product manufacturers.

PPFA Codes and Training Specialist Michael Cudahy wrote in comments, “Resin formulations must have certain impact, dimensional stability, chemical resistance, chemical extraction, tensile strength, and modulus across a specified temperature range.”

C. Dean Thompson, President, Resilient Floor Covering Institute, stressed the “complexity of developing workable PVC resins” for sheet or tile flooring and cautioned against a rule that might limit or eliminate resins required for certain flooring products. He wrote, “Even a minor change in the properties of the resin can adversely affect the production process and performance characteristics of [vinyl] products.”

The comments underscored the importance of PVC/vinyl products. Bruce Hollands, Executive Director of the PVC Pipe Association, wrote, “Use of more sustainable materials like PVC could save U.S. taxpayers billions of dollars annually. Savings from PVC now used in U.S. sanitary sewer systems are estimated to be \$270 million a year, or \$1.5 trillion over the next 100 years. Converting the entire U.S. sanitary sewer system to PVC pipe could yield \$800 million in annual savings and as much as \$4.5 trillion over the next century.”

Rich Walker, President and CEO of the American Architectural Manufacturers Association, noted that vinyl windows and doors account for 67% of all conventional residential sales of these products in the U.S. He added, “The extrusions purchased from vinyl producers to create window profiles are designed to perform to specific criteria to meet or exceed established standards of energy-efficiency; impact resistance and weathering capabilities.”

Chemical industry groups weighed in on provisions that could set precedents for the broad chemical sector. The American Chemistry Council and Chlorine Institute, for example, opposed a proposal to require alarms and gauges on pressure relief valves. ACC noted the agency had not shown that release valves result in substantial emissions or that the additional devices would reduce the occurrence or magnitude of emissions.

Business groups commented on the potential economic effects of the proposal. Paul Yost, Vice President, Energy and Resources Policy for the National Association of Manufacturers, commented, “At a time when our economy is attempting to recover from the worst recession in a generation, overreaching environmental regulations that increase costs for manufacturers and consumers will cause further job loss.”

Blakey stressed VI’s support for effective regulation. “This rule-making process, along with state regulations, voluntary industry actions and other drivers, historically has helped the entire industry continually improve,” Blakey said.

PVC manufacturers spent millions of dollars in tests over the past three years at 18 production facilities to give EPA emissions data to use in drafting the proposed rules.

MACT rules are written under the Clean Air Act for various industry sectors and must be updated periodically. They require all facilities in a sector to reduce air emissions to the level of the top performers – five facilities, in the case of the PVC resin industry. A final PVC MACT rule is due in January 2012. To follow the rulemaking process and to read comments visit www.regulations.gov, docket EPA-HQ-OAR-2002-0037.

For questions regarding the Vinyl Institute, contact [Allen Blakey](#) or [Kevin Mulvaney](#).