



DEC 22 1977

Interoffice Communication

To Distribution
From D. A. Kuhn
Date December 21, 1977
Subject EPA Benzene Standard

~~EV~~
~~ADACG~~
EV-760,2 circ to
copies to CDB
(~~ADACG~~)
FK
LDW
GJF
JHM
FEL
LKM-file

In a conversation with Dave Patrick of EPA on December 19, 1977, I learned that a benzene emission control standard for alkylbenzene manufacture has low priority with the EPA. Patrick is in charge of developing standards for benzene and works for Don Goodwin, at Research Triangle Park.

It is EPA's opinion that the emissions for alkylbenzene production are quite low. Many other sources and processes represent much greater potential for public exposure and so will be regulated first. Patrick cited automobiles as the largest source of community exposure to benzene, followed by petroleum product's distribution and marketing. Petroleum production and refining are low priority because benzene emissions are thought to be small. Only six chemical processes are scheduled for study now. Maleic anhydride is the most important because it is an oxidation process where the exit vent contains large quantities of benzene vapor. A draft proposal will be available in April, 1978. EPA will also study manufacture of nitrobenzene, ethylbenzene, styrene, cyclohexane and ethylene. EPA's ethylene study will concentrate on its manufacture from heavy feedstocks.

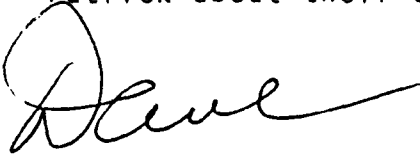
EPA is apparently somewhat overwhelmed with the enormity of the task of regulating benzene. The rulemaking proceedings may extend over a lengthy period. Probably the earliest impact at Conoco will be felt in marketing with the refining in chemicals deferred quite far into the future. Patrick mentioned a possibility that a common standard for benzene storage could be promulgated early. It would seem prudent for us to concentrate our first efforts on that aspect of controlling benzene emissions.

I offered our help to produce a good quality standard. Patrick declined to accept it just now because it is too early in the game. He did say he was going to send Chemicals a 114 letter asking a few questions about alkylbenzene production. I agreed to touch base with him from time to time to learn his progress and find out when we should begin working with him.

MCD 000001816

Distribution
Page 2
December 21, 1977

If any of the recipients of this letter would like to talk with Patrick about their operations, please give me a call.



D. A. Kuhn

ke

Distribution

Dick Darling
Debs Gamblin
Don Sanders✓
R. E. Lehmkuhl
Jack E. Cearley
O. Roy Barresi
Dennis Boeshart
Don R. Bonberger
R. L. Johnson
Austin McCloud
Gordon Regan
R. M. Robinson
Coralie Sanders
Don B. Eicher
Ray C. Allred
J. J. Doyle
Art F. Gallagher
Ken C. Hunt
Oran D. Steffey
C. L. Whetstone, M. D.

MCD 000001817