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May 30, 1974

EPA Action @ Vinyl Chloride

Mr. F. L. Bissinger

This information from Durham tends to confirm your message to me. If press release occurs today, June 6 or 7 timing may be in error.

Original Signed
E. W. Callahan
E. W. Callahan

EWC/cm

Attn.

cc: Mr. D. H. Bradford, Jr.

attn only to:

P. H. Shellenbeger
+ J. Kent

ALLIED CHEMICAL CORPORATION

MEMORANDUM

May 30, 1974

TO: A. J. von Frank
E. W. Callahan
W. S. Ferguson
J. M. Quinn
W. L. Sullivan

SUBJECT: EPA Action - Vinyl Chloride (Dictated by phone 8:30 a.m.)

It is expected that on June 6 or 7 Russell Train of the EPA will hold a press conference reporting on EPA activity to define necessary controls for vinyl chloride. Reportedly, EPA sampling adjacent to monomer and polymer plants has indicated "high" concentrations of vinyl chloride. Word is that Train will condemn industry as not having taken sufficient steps to control vinyl discharges and states that concentrations are well-----those which would be indicated by emission survey data. He will use vinyl chloride as an example to Congress as to why the Toxic Substances Act should be passed.

At the present time, the vinyl chloride investigation lead rests with the Office of Toxic Substances headed by Schweitzer. The EPA believes that the primary problem is in the air area and, as such, the Durham offices will be given the lead position. Action by them will be:

- a) Visits to key monomer and polymer plants to conduct actual testing and obtain industrial estimates of emission levels. A contractor (Houdry) will assist.
- b) Houdry will determine the cost for air pollution controls.
- c) The EPA will determine the level of control needed. At this time, their preliminary thinking will be based on achieving a concentration of ≤ 60 ppb.
- d) The EPA Strategy for Air Standards Division indicates that vinyl chloride would be cited as a hazardous pollutant with the establishment of Federal emission standards being proposed within three weeks. The Houdry study is being managed by L. Evans of the EPA and it is expected that Allied will be one of the firms contacted. There is some concern that high fugitive losses of VCM could lead to the establishment of an ambient air standard. However, this is doubted.

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Fence line testing by the EPA in several regions has shown "high" (?) levels of vinyl chloride. Levels may be on the order of 2-10 ppm and are far in excess of what would be calculated by the dispersion equations. However, this is understandable because of the high molecular weight of vinyl chloride and the normally short stack heights used as emission points. The writer's experience has shown that it is most difficult to disperse vinyl chloride. It may travel at ground levels for distances of several hundred yards before being dispersed. The regional EPA representatives are meeting in Atlanta next week to submit preliminary control recommendations in time for Train's news conference on June 6 or 7.

MCA activity in the vinyl chloride area has been limited primarily to the OSHA problem. There is feeling within MCA that the vinyl chloride problem does not cover enough of the member companies to mandate strong MCA response. There have been a considerable number of statements made that the SPI should be the umbrella for industrial activity.

W. M. Reiter
(830)

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