

March 8, 1982

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SUBJECT: Kanawha Valley Air Emissions

REF : W. Va. Clean Air Coalition Press Release of
 March 5, 1982 (Attached)

REF : INSIDE EPA, April 4, 1980, Pages 9, 10
 (Attached)

The attached is for your information.

ack
J. L. Worstell

JLW:co

Attachments (2)

UCC 100210



West Virginia Clean Air Coalition

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For Immediate Release
March 5, 1982.

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Cites Study of Charleston's FMC & Union Carbide Plants

CLEAN AIR COALITION CALLS FOR NEW LAW TO CLEAN UP TOXIC CHEMICAL AIR POLLUTION

The West Virginia Clean Air Coalition called today for support of the Waxman Clean Air bill which would begin to control potentially hazardous emissions from chemical plants. Coming on the heels of a W.Va. Department of Health study of increased cancer rates in North Charleston, near Union Carbide & FMC chemical facilities, a report released by the Clean Air groups specifically blasted those two Charleston area firms as being among the nine worst chemical air polluters in the United States. FMC was the third largest source of the potentially hazardous toxins, according to the 1980 report originally prepared for the Environmental Protection Agency (EPA).

"EPA has been authorized to establish health standards for these hazardous pollutants for over a decade, but they have been putting it off & putting it off, no doubt due to encouragement from the petrochemical industry," said Willis Farley, a retired Machinist/chemical worker and a representative of the Coalition on Legislation for the Elderly. "EPA has established health standards for only four of the hundreds of toxic air pollutants being emitted by chemical plants around West Virginia."

The EPA study listed the 235 chemical plants in the U.S. that emit more than 10,000 pounds per year in aggregate of thirty-five (35) potentially hazardous air pollutants. FMC emits over 2 million pounds per year of the 35 pollutants, while Union Carbide's Institute plant gives off over 1.5 million pounds per year.

According to a report prepared for the Natural Resources Defense Council and submitted to Congress in December by two expert scientists, thousands of future lung cancer cases each year could be prevented by better air pollution control. At least 11 percent, and most likely 21 percent, of lung cancer cases now occurring each year are probably attributable to air pollution, according to Dr. Nathan Karch, formerly senior staff scientist with the Council on Environmental Quality and Dr. Marvin Schneiderman, former associate director of the National Cancer Institute. This means approximately 10,000 to 20,000 cancer cases in the U.S. population due to air pollution.

In the future, the scientists said, up to 19% of new lung cancer cases may result from current levels of air pollution, unless reduced. In addition, the American Lung Association recently announced that one out of four cancer victims die from lung cancer.

"Congressman Henry Waxman introduced a Clean Air bill, H.R. 5555, which addresses this problem of toxic air pollutants, just last week," said Charles Garlow, Director of the W.Va. Clean Air Coalition. "It would require the EPA to establish health standards for 37 hazardous pollutants that the EPA has had under 'evaluation' for more than four years, without action. There are dozens more substances in the air of potential concern. We call upon our W.Va. Congressional delegation to support the Waxman Clean Air bill and reject the Dirty Air Dingell bill, H.R. 5252, a competing piece of legislation. W.Va. Congressmen Mollohan & Benedict are co-sponsors of the Dingell bill, H.R. 5252." Garlow added.

"W.Va. Congressman Cleve Benedict is a member of the House sub-committee on Health & Environment, which is marking up the Waxman Clean Air bill & the Dingell Dirty Air bill this week & next week," commented Mr. Farley. "Benedict's record has been 100% against Clean Air so far. We're very disappointed. Those of us

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who live here in "Chemical Valley", also known as Cancer Valley, should be very concerned about Benedict's voting record. ""

"The chemicals listed in the 1980 study include such unfortunately well-known, mean-sounding compounds as carbon tetrachloride, chloroform, dioxin, formaldehyde, PCBs, phosgene, and benzenes of all sorts," added Farley. "For too long, we have focused almost solely on coal-fired power plants and have left this problem of chemical air pollution on the back burner," he continued. "These are deadly chemicals. Sometimes only a few parts per million are all we can stand."

Other W.Va. chemical plants that emit more than 10,000 pounds per day of the 35 pollutants are:

Dupont	Belle, WV	201,300 pounds per year			
Diamond Shamrock	Belle, WV	218,390	"	"	"
Union Carbide	So. Charleston, WV	55,410	"	"	"
Dupont	Parkersburg, WV	700,000	"	"	"
Borg-Warner	Morgantown, WV	24,000	"	"	"
Koppers	Follansbee, WV	26,988			
Mobay	New Martinsville, WV	1,256,556	"	"	"
PPG	New Martinsville, WV	400,170	"	"	"
American Cyanamid	Willow Island, WV	17,900	"	"	"

have had no difficulty in attaining compliance levels. Less standardized processes with innovative control equipment, however, have experienced frequent breakdowns. Typically, other processes with violation problems are sources which either produce odors or have poor maintenance procedures."

The San Diego study, conducted by Pacific Environmental Services, cites as an example of "failure with the technological forcing policy" mandated installation of vapor recovery systems on gasoline dispensing facilities for vehicles. "The mandate came too soon to have a reliable system available," the study says.

Data problems. "There was a general lack of stack tests at nearly all sources," reported Pedco in a study of compliance in the Houston area. "Compliance tests are usually performed within a few months after the equipment is put into operation; further tests are generally not performed unless there is reason to believe that the source is out of compliance." As a result, the study said, "current emissions are difficult to quantify" and "emissions tests are generally not performed on a regular basis."

The Houston study also found operation & maintenance programs "generally at a low level" ("none of the sources described a comprehensive preventive maintenance program"); and spare equipment and parts inventories "inadequate" and in some cases "almost non-existent". Pedco also reported that a local rule permitting sources to escape findings of violation — if they notify regulators of an "upset condition" and show "reasonable diligence in bringing the emission under control" — tends to be overused. "The rule seems to be utilized in some cases as a substitute for the installation of proper control equipment." But the study found "almost constant surveillance" by local regulators has been "an effective means of obtaining compliance with regulations."

Reporting problems. A study of New Jersey air pollution sources, conducted by The Research Corp. of New England, found that 13 of 22 sources at some time had excess emissions but also found a relatively mature compliance program in place, "with a positive attitude toward operation and maintenance of control equipment on the part of most operators."

But the study also identified some problems. The "strong enforcement posture" of New Jersey regulators "discourages voluntary reporting of excess emission incidents. The lack of a requirement for submission of hard documentation of continuing compliance (e.g., continuous monitors, periodic stack tests) also discourages routine accumulation of such information. It may be that the strong agency enforcement attitude promotes a source attitude which seeks to avoid having available self-incriminating material."

THE NATIONAL GOVERNORS ASSN. IS SEEKING EPA FUNDS FOR A WASTE SITING STUDY, last week formally submitting its proposal to EPA for a one-year study on problems for state siting of hazardous waste facilities.

The study would be a continuation of an EPA program to include state participation through NGA in implementation of the Resource Conservation & Recovery Act. To date, those activities have focused on involving the states in the drafting of the regulations. That focus will now shift to hazardous waste siting.

The NGA-proposed study would in part be a followup study to a survey recently completed by the National Conference of State Legislatures which catalogued the hazardous waste disposal plans in 37 states. The NGA study would concentrate on current state problems and state reactions to public participation financing and liability aspects of siting waste facilities in their state. The study will examine current siting regulations in each state, explore "the pre-emption issue" to discuss each state's attitude toward federal pre-emption, and query states "on how they feel about regional cooperation" for siting waste disposal units.

The final product of the NGA study will be position papers submitted to EPA by year-end outlining key state concerns. The information is expected to plug into EPA's own efforts to develop a siting policy. EPA last month formed an internal hazardous waste siting committee (Inside EPA, 28 March, 13) to explore these siting issues and is pointing toward development of its position following submission of the NGA study.

REPORT RANKS TOP 20 U.S. SOURCES EMITTING CHEMICALS UNDER STUDY BY EPA

An EPA contractor report assessing total emissions from 35 possible airborne carcinogens has found FMC's South Charleston, W.Va., facility with the highest exposure rate, followed by Arco's plant in Houston, an IMC facility in Seiple, Pa., and Amoco's Decatur, Ala., plant. The report, prepared by Systems Applications Inc., evaluated total U.S. dosage for 35 chemicals that are now under study by EPA to determine if these chemicals should be listed as hazardous air pollutants. Encased in that report, which ranked the 35 chemicals in terms of total exposure to the population at large (Inside EPA, 28 March, 3), was a rundown of the 20 largest U.S. emitters of these 35 chemicals. Systems Applications surveyed major point sources nationwide, providing the basis for the list, which appears on page 10.

EPA officials have explained that no decisions have yet been made on which chemicals to list as hazardous pollutants, but they said that pending EPA decisions, these 20 major sources might become prime candidates for regulatory control. Dow Chemical's Freeport, Tex., facility, for example, may well require new controls since the plant emits trichloroethylene and EPA officials have indicated that trichloroethylene has

both a high probability of carcinogenicity and a high exposure rate — thus making it a prime candidate for listing.
(In the following, dosage is calculated as exposed persons X annual average atmospheric concentration of exposure).

Company Rank-(location)	Chemical	Individual Chemical Dosage (ug/m ³ x people)	Company Rank-(location)	Chemical	Individual Chemical Dosage (ug/m ³ x people)
1 C (S. Charleston, WV)	Carbon tetrachloride	2,310,000	11 Union Carbide (S. Charleston, WV)	o-Dichlorobenzene	145,000
2 Arco (Houston, TX)	Toluene	12,500		Phosgene	4,460
	m-Xylene	9,870		Propylene oxide	3,050
	o-Xylene	371,000		Toluene	5,560
	p-Xylene	302,000			158,070
		695,370	12 Hercules (Hopewell, VA)	Nitrobenzene	158,000
3 IMC (Seiple, PA)	Acetaldehyde	9,750	*13 Shell (Deer Park, TX)	Allyl chloride	2,160
	Formaldehyde	581,000		Epichlorohydrin	40,300
		590,750		Phenol	1,570
4 Amoco (Decatur, AL)	p-Xylene	558,750		Toluene	7,520
5 Allied (Moundsville, WV)	Carbon tetrachloride	725		m-Xylene	647
	Chloroform	18,900		o-Xylene	45,200
	o-Dichlorobenzene	382,000		p-Xylene	15,700
	Methylene Chloride	70,600			143,550
	Phosgene	6,190	14 Du Pont (Deepwater, NJ)	Carbon tetrachloride	25,000
	Toluene	8,290		Chlorobenzene	13,900
		486,705		Chloroform	33,300
6 Amoco (Copper River, SC)	p-Xylene	381,000		o-Dichlorobenzene	48,800
7 Monsanto (St. Louis, IL)	Benzyl chloride	1,580		Nitrobenzene	330
	Chlorobenzene	282,000		Phosgene	3,500
	o-Dichlorobenzene	15,200		Toluene	6,740
	p-Dichlorobenzene	24,400			131,570
	2,3,7,8-TCDD	1.6	15 Mobay (Baytown, TX)	o-Dichlorobenzene	116,000
	Toluene	960		Phosgene	2,080
		324,142		Propylene oxide	123
8 Vulcan (Wichita, KA)	Carbon tetrachloride	36,400		Toluene	4,520
	Chloroform	44,700			122,723
	2,3,7,8-TCDD	0.73	16 Dow (Plaquemine, LA)	Carbon tetrachloride	14,900
	Methylene chloride	161,000		Chloroform	8,440
		242,100		Ethylene oxide	10,500
9 Dow (Freeport, TX)	Allyl chloride	4,950		Methylene chloride	34,800
	Carbon tetrachloride	1,780		Nitrobenzene	13,200
	Chloroform	3,830		Propylene oxide	4,430
	o-Dichlorobenzene	67,400		1,1,1-Trichloroethane	30,300
	Epichlorohydrin	19,100			116,570
	Ethylene oxide	6,310	17 Du Pont (Laplace, LA)	Chloroprene	90,200
	Methylene chloride	21,100		Toluene	25,400
	Phenol	8,320			115,600
	Phosgene	1,110	18 Union Carbide (Institute, WV)	Nitrobenzene	109,000
	Propylene oxide	22,700		Propylene oxide	4,130
	Toluene	11,200			113,130
	1,1,1-Trichloroethane	71,600	19 Olin (Lake Charles, LA)	o-Dichlorobenzene	104,000
	Trichloroethylene	1,550		Phosgene	1,320
	m-Xylene	180		Propylene oxide	57
	o-Xylene	100		Toluene	4,240
	p-Xylene	84			109,617
		241,314	20 Celanese (Bishop, TX)	Acetaldehyde	4,910
10 Du Pont (Parkersburg, WV)	Formaldehyde	199,000		Formaldehyde	99,100
					104,010

*Study shows totals as indicated, but individual chemical doses don't add up to total. If individual listings were used, Shell plant would rank 19th (total = 113,097).

INSIDE E.P.A. — April 4, 1980

UCC 100215