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VVC 000002521

L. N. Vernon
June 3, 1974
Page 2

8. An attempt will be made to have our objection reviewed by June 5, approved by H. Hardesty by June 7, and submitted to OSHA by June 11. (KLS)

Discussion:

K. L. Schurter discussed the position on exposure to VCM being taken by other members of the industry as discussed at a recent SPI meeting. Dow proposes a 10 ppm TWA/25 ppm Ceiling (C) value. Goodrich proposes the following schedule:

15 TWA/30 C by Oct. 5, 1974
10 TWA/20 C by April 5, 1976
5 TWA/10 C by Oct. 5, 1977

The SPI is apparently going to propose a 1000 ppm-hr concept, a concept that Conoco decided it cannot support.

Data from Aberdeen was reviewed by E. M. Smith. These results and our analytical procedures were discussed at length. It was decided that without accurate, VCM specific data, we could not confidently estimate what VCM levels our plants could realize in the immediate future. We expect to get this type of information when the Honeywell gas chromatographic analyzers are operational, but this is not expected prior to August. Consequently, the following position was decided upon:

Compliance with a "no detectable limit" exposure requirement will force a shutdown of the U.S. VCM and PVC industries, including Conoco's facilities. Exposure limits of 25 ppm TWA and 40 ppm C are feasible. Conoco will continue to strive to reduce exposure below these levels and expects to be successful in our VCM plant and in our large reactor areas by October, 1974. It is estimated that exposure limits of 15 ppm TWA can be reached in all our facilities by October, 1975. Available technology will not allow confident commitment to operation at VCM levels below these values at present time.

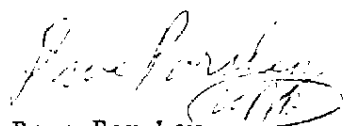
This position was incorporated into our formal objection list by R. W. Gerwig.

The objections to the PPS formulated in Aberdeen were discussed and modified as appropriate. The results of this portion of the meeting have already been incorporated into revised objections and transmitted as required in action step No. 6. They will not, therefore, be discussed herein.

Other items discussed during the meeting are summarized in the action steps listed above.

VVC 000002522

L. N. Vernon
June 3, 1974
Page 3

A handwritten signature in cursive script, appearing to read "Dave Porchey", with a circled date "6/1/74" written below it.

Dave Porchey
Research Chemical Engineer
Engineering Research
Chemicals Research Division

cdp
cc: Attendees
RTF
RDG

VVC 000002523