



INTEROFFICE / LAKE CHARLES

TO T. C. Jeffery

DATE February 14, 1977

FROM

T. G. Taylor

26 Taylor

SUBJECT

VDCM Emissions

REC'D FEB 16 1977

Attached is correspondence from Jack Hays pertaining to VDCM inhalation studies with rats and mice. Very likely, VDCM will in time be subjected to regulations similar to those existing for VCM. Because of this, we need to get a program underway to identify our situation in respect to VDCM emissions. To get the ball rolling please do the following:

1. Contact Bob Lynch and ask him to get an RES prepared for the identification and control of VDCM emissions.
2. Assign this work to the appropriate Process Engineering Group Leader.
3. Prepare and submit a Laboratory Project Request for an analytical survey to identify the number and magnitude of VDCM emissions. Personnel exposure surveys should be included in this item.
4. Prepare answers to the five questions listed by Jack Hays. These answers should be reviewed by Production and Shipping supervision before mailing to Jack.

edh

cc: J. R. Farst
C. R. Reiche/O. L. Cromeans
R. P. Lynch
J. C. Lafleur
H. J. Hoenes
F. C. Ludden/H. B. Lovejoy

Attachment

SL 084881



INTER OFFICE CORRESPONDENCE

To: T. G. Taylor

Date: February 4, 1977

From: J. D. Hays

Location: G. O., 20 North

Subject: VDCM

As you know by now, Professor Maltoni reported on his findings from his VDCM inhalation study which was being sponsored by the European VDCM producers. Although the rats and hamsters developed no tumors associated with VDC exposure, some mice were reported to have kidney tumors at exposure levels as low as 25 ppm. In contrast, minimal liver changes only have been reported on the rats currently being tested in an MCA-sponsored study; however, histological examinations of all tissues have not been completed.

The latest information has been forwarded to the plant and to our sales offices. Also, MCA has notified all of the appropriate U. S. governmental agencies.

In view of all of this, I think that we have the potential for much more stringent regulations for VDCM. The above data only indicate that VDCM would be a suspect carcinogen, but this could be enough to create a strong reaction by the regulatory agencies.

I do think that we should undertake a complete examination of our VDC process (and other VDC-bearing streams in Area B) to determine exactly what our emission and exposure levels are and what is necessary to reduce them to "acceptable levels". I realize that this is an ambiguous term, but we could, potentially have another VCM-type regulation on both TWA and emissions in the very near future.

Specifically, some of the problem areas that I can think of are:

1. Dumping of the VDCM reactor due to a build-up of per. Where do we stand on the program to both minimize dumping and to divert the bottoms to the new stripper when dumping does occur? Will this be completed by the July 1, 1977 NPDES deadline? What will be the containment method at the stripper for sewer segregation? Will it be vented or incinerated?
2. VDC section vent emissions. Have we defined the extent of these losses yet? Do we have methods of limiting this to less than, for example, 10 ppm? What is the schedule for this?
3. VDCM loading losses. Do we still have the problem of venting of the tank trucks? What are the possibilities if we cannot use the vent stock?

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VDCM

4. Personnel exposure. Has this been adequately defined? If so, are we in compliance?
5. VDC in other organic streams. Are other VDC-bearing streams sufficiently contained or incinerated? Some typical examples are the DH vent streams at per/tri and OHC.

I am sure that you can add many other items to the above list, but obviously, we have to do whatever is necessary to define our position and our program and also to have a timetable for implementation of this program.

Could I have your comments on the above items and, if you wish, we could get together and discuss them.

Jack

J. D. Hays

/kf

cc: F. C. Dehn
J. R. Farst
I. C. Klimas
G. J. Lazarchik

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