

To: (See Attached Distribution List) Date: March 6, 1975

From: Dr. A. B. Steele

Subject: Vinyl Resin Operations
Flash Report

Vinyl Chloride Monomer

EPA

EPA's proposed regulation for vinyl chloride emissions requires that all process vents be reduced to a 10 ppm vinyl chloride concentration. Permissible reactor cleaning and dryer losses, in addition to the above, are .0014 lbs./lb. of resin produced. Losses via waste-water streams are to be less than .000043 lbs./lb. of resin produced. EPA expects to complete its work on the regulation in time for it to be made effective in the last quarter of 1975.

OSHA

The Petition for Writ of Certiorari is scheduled for presentation to the Supreme Court of the United States late this week. The final draft authored by Carbide, Firestone and the Society of the Plastics Industry has been circulated and approved.

Statement of Current Business Thinking Relative to OSHA/EPA Regulation of PVC Suspension Resin Operations

At present, the PVC Suspension operation cannot reasonably determine whether the Texas City unit will be able to operate safely and economically after April 1, 1976 when the use of respirators will become mandatory for all employees exposed to concentrations in excess of 1 ppm (8 hr. TWA). Additionally, the EPA is positioned to impose highly restrictive standards on VCM emission in the air, water and landfill. Accordingly, the PVC Suspension operations is presently reviewing and evaluating the probabilities of being able to feasibly meet the demanding requirements of the permanent OSHA standard and the proposed EPA standard after April 1, 1976; whether the technology required, but not now in hand, will be developed to meet the demands of these standards; whether the enormous capital expenditure which will be required in attempting to comply with the standards are warranted by economic conditions; alternatively, whether operations at Texas City are incapable of meeting the standard's requirements without extensive use of respirators and extensive processing of process effluents must be terminated.

The Operations Group cannot make prudent judgments on the issues confronting it until the final status of the OSHA standards has been decided in the courts and the right of EPA to impose excessive restrictions tested similarly.

March 6, 1975

Specialty Resins

Chewing Gum Base Resin produced was 117% of plan. The Pelletized Resin System remained down to clean the dryer.

Resin Solution produced was 74% of plan.

Suspension Resins

Production was 28.3% of Plan to match the continuing depressed sales rate. Only the North line was in operation and February production approximated 3 million pounds.

After producing a hopper car amount of QSAL for Amoco, the North line was switched back to regular QSAN. Quality was excellent except for slightly low particle size caused by 120 rpm agitation. Series stripping on the North line seems to be holding down pretty well the residual monomer content of the resin. During the week, QSAN averaged 113 ppm and QSAL 198 ppm.

Non-Solvent Resins

The Unit remained down for lack of product demand. It will probably remain down throughout the month of March.

A. B. Steele

ABS:ml

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