



Est. 2268
Dave Cullen
Byrd-Hampton

Copy 2nd
to 8-14-73

Interoffice Communication

To J. D. Burns
From R. D. Gamblin
Date August 9, 1973
Subject Plant Pollution Study By EPA and Roy F. Weston, Inc.

The attached letter explains the fact that the firm of Roy F. Weston, Inc. have selected the VCM Plant to study under an EPA contract. The purpose of the study is to obtain data on which to base effluent standards. We expect them to call in the near future to schedule the visit during September, 1973. We need to determine what our response should be. If we must permit the study, several points need clarifying. By copies of this letter we are asking advice from S. H. Mcatee in Houston and Pete Samsell in Washington, D.C.

Some of the more obvious considerations are:

- 1) Stauffer may have to agree to the third party disclosure..
- 2) The study appears to be directed toward liquid effluent with no specific mention of air streams. This may need to be predetermined.
- 3) Since both the plant and secondary waste system are under licensing arrangements, an exemption from public disclosure would be needed.
- 4) Permitting sampling of individual process waste water streams appears to go beyond what is needed to set standards. Such a program may lead to reducing our flexibility to select the most desirable correction alternatives.
- 5) Names and number of persons involved in the visit should be predetermined.
- 6) Will copies of plant drawings, photos, etc. be permitted?
- 7) The Company should be given a copy of all information obtained from the plant which is given to the EPA.
- 8) Duplicate analyses by plant personnel should be permitted and any differences resolved prior to transmitting data to the EPA.
- 9) The "Operating" personnel to which they have access should be specified and limited by the Company.

CCR 000035091

J. D. Burns
Page 2
August 9, 1973

Due to the timing we need to determine our response probably within the next two weeks.



R. D. Gamblin

is
CC: LNV
CC + enc:
S. H. Mcatee
R. M. Robinson
Pete Samsell

CCR 000035092