



Organics & Polymers Division
(COMPANY)

INTEROFFICE COMMUNICATION

TO: ALL EMPLOYEES
FOR:
FROM: D. R. KECK
RE: OSHA REGULATION ON VCM EXPOSURE

DATE: February 18, 1975

Pollute

On December 30, 1974 you were advised that the promulgation of the October regulation was placed in abeyance pending an opinion by the United States Second Circuit Court of Appeals on its legality. The Court now has ruled the OSHA regulation valid and further ruled that it shall become effective on April 1. In the meantime, monitoring of the Pasadena PVC plant is continuing and measures to control the concentration of VCM in the air are being implemented.

D R Keck

D. R. Keck
Manager of Manufacturing

DRK:wm

cc: ✓ Dr. H. E. O'Connell
Mr. G. I. Rozand

INTER-OFFICE MEMO

TENNECO CHEMICALS INC.

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CFA

jni

TO Dr. S. R. Sheeran

AT Saddle Brook

August 26, 1975

FROM Mr. W. P. Anderson

AT Saddle Brook

COPY TO Mr. G. S. Flint

SUBJECT PROPOSED HYDROCARBON CONTROLS -
E.P.A. PLAN FOR TEXAS

File Pasadena Air Pollution Control
*This is, in a way, good news;
more a substantial retreat from bad news*
3/8/75

You will recall that I have expressed concern over the possible enforcement of what amounts to a "no growth plan" as part of the E.P.A. strategy to control hydrocarbons and photochemical oxidants in the Houston area.

I have a draft of the latest proposal for such regulations and am pleased to note the "no growth" proposal has been greatly relaxed.

It looks as if E.P.A. has finally recognized the technical and economic facts of life and modified their stance accordingly even though they acknowledge the new proposals may not result in meeting the Federal Air Quality Criteria as required by the Clean Air Act.

Briefly, the proposed measure includes:

1. Extension of Texas Regulation V (Control of Volatile Hydrocarbon Emission from Stationary Sources) to two more counties.
2. Control of vapor losses from crude oil.
3. Control of vapor losses from gasoline marketing.
4. Control of solvent (degreasing) vapor losses.
5. Control of vapor losses from ship and barge loading and unloading operations.
6. Light duty vehicle inspection.
7. Some moderate reduction in vehicle miles traveled. Encouraging formation of car pools, etc. is mentioned; with quotas, but these would seem very difficult to enforce.

Previously proposed rules dropped in this draft are:

8. Retrofit of light duty vehicles.
9. Limitation of new reactive carbon compound emission sources.
(Please note comment below)
10. Gasoline limitations.

Two of the above affect us at Pasadena.

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INTER-OFFICE MEMO

TENNECO CHEMICALS, INC.

TO See Distribution
FROM D. E. Rhoads
SUBJECT OSHA STANDARDS AND INSPECTIONS

AT
AT Saddle Brook

DATE August 20, 1975

COPY TO
T. R. Aalto
P. L. Bogart
J. S. Boyle
J. Byrnes
E. H. Cox
F. Harkay
F. M. Toca
S. Wool

OSHA expects to publish proposed standards for benzene, lead, beryllium and trichloroethylene before the end of August. During September they expect to publish proposed standards for ammonia, toluene, sulphuric acid, sulphur dioxide, asbestos, chloroform, ionizing radiation, lasers, cotton dust, and non water carriage disposal systems (chemical toilets). Other proposed standards in process which will not be published until after September are carbon monoxide, toluene diisocyanate, crystalline silica, MOCA (methylene bischloroaniline) and mercury.

This sudden activity was prompted by a directive from the Office of Management and Budget and the Council on Wage and Price Stability which requires that all proposed standards after September 30th which could have an inflationary impact over 150 million dollars in a two year period, contain an inflationary impact study. This directive also requires that proposed standards published prior to September 30 publish an inflationary impact study 30 days before the hearing on the individual standard. Standards with an inflationary impact, of less than 150 million dollars will require a statement rather than a full study. The hearings on the above standards may be later this year or during the first half of 1976. OSHA is setting up a major contract with Arthur Young for impact studies and will probably set up contracts with other companies for impact studies.

OSHA recently initiated a pilot inspection program in New Jersey on industrial hygiene in petro chemical plants. It includes an initial visit to the plant to check injury and illness records with emphasis on chemical exposure, list of the chemicals and process flow sheets. The initial visit usually does not include a plant tour. Subsequently the OSHA industrial hygienist returns to sample the working environment. To date we have had initial visits at Burlington Elizabeth, East Rutherford, Flemington, and Garfield with a follow up visits at East Rutherford and Garfield. Other chemical companies in New Jersey have experienced similar visits.

Mr. Marshall Miller recently transferred from EPA to OSHA and is managing the standards writing activities. He reports directly to Mr. Dunlop, Secretary of Labor. Mr. Miller, a lawyer, is very young and has had very little industry experience or exposure. The impression of some people at a luncheon on August was that Mr. Miller feels that he has a great mission, a tremendous confidence in himself, and a tendency to make snap decisions and dogmatically defend them. As example in discussion he stated that he felt the OSHA Review Commission rules have no bearing on the Office of Standards.