



UNION CARBIDE CORPORATION
PERFORMANCE CHEMICALS AND POLYMERS DIVISION
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R. N. Wheeler, Jr.

March 11, 1980

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Mr. A. S. Amatangelo
Union Carbide Corporation
270 Park Avenue 33 Floor
New York, NY 10017

Subject: Proposed Vinyl Chloride Rule Promulgation 1005.1
South Coast Air Quality Management District

Dear Tony:

For your information, I have attached a copy of the oral testimony given to the Air Quality Management District Board on March 7, 1980. Nick Wheeler accompanied me and has given an immense amount of help with preparation of written submissions and strategy development. He deserves a lot of credit for his expert help. Also, attached is a listing of the Board Members and a summary of the rule. Unfortunately, Board Member, Mrs. Gladys Meade from the Lung Association, lives in Torrance.

The hearing ended with a one-month reprieve on a decision. The Board has decided to visit the affected plants before the next meeting, April 4, when a vote will be taken. (Mrs. Meade entered a motion to pass the rule, as written, but later withdrew her motion when the plant visits were suggested). We will do our best to favorably impress the Board when they visit.

Now, more is to come! The District has decided to rewrite and tighten up on the base rule 1005. They have scheduled a workshop meeting for March 13.

Our sales force and RTM's are continuing to pursue "VACA" business in this region. I would like to see the business team address the advisability of this "thrust" in view of the District's hard stance against vinyl chloride. The factors to consider are:

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- a. Are we willing to make the investments required by 1005.1?
- b. If our Western Region VACA business continues to grow, we will need another VACA Reactor System. Are we willing to replace the No. 3 line cooling tank?
- c. With little room for error in violating the Districts rules, is Union Carbide willing to accept adverse publicity, if some mishap occurs?
- d. What will the next rule be?

May I have some comments on your views?

Very truly yours,



G. W. Sanders

GWS/bd

Enclosures

cc: Dr. T. L. Dawson - So. Chas. 720-126
Mr. K. J. Hutchinson - New York - 33
Mr. P. J. Johnston - New York - 33
Mr. G. L. Miller - So. Chas. 2000-3331
Mr. K. G. Morlock - Alsip
Mr. E. L. Peterson - New York - 33
Mr. R. N. Wheeler - So. Chas - 3005-210/511

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* Councilman, City of San Bernardino
** Councilman, City of Anaheim
***Councilman, City of Rolling Hills

June, 1979

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MY NAME IS GLOVER SANDERS. I AM PLANT MANAGER OF UNION CARBIDE CORPORATION'S LATEX PLANT IN TORRANCE. I HAVE MANAGED THIS PLANT FOR SIX YEARS AND HAVE BEEN A RESIDENT OF LOS ANGELES COUNTY FOR 14 YEARS. WE HAVE PREPARED WRITTEN COMMENTS ON THE PROPOSED RULE, WHICH I AM PROVIDING THE BOARD. TO CONSERVE THE BOARD'S TIME, I WILL DISCUSS ONLY THE HIGHLIGHTS OF THE WRITTEN SUBMISSION.

THE UNION CARBIDE PLANT IS LOCATED ON A ONE ACRE SITE. WE EMPLOY 34 PEOPLE AND OPERATE FIVE DAYS A WEEK TO PRODUCE 34 DIFFERENT PRODUCTS TOTALING LESS THAN 30,000,000 POUNDS PER YEAR. THE PLANT IS LOCATED IN CALIFORNIA TO SUPPLY BASIC LATEX MATERIALS FOR WATER BASED PAINTS, SEALANTS, CAULKS, ADHESIVES, AND TEXTILE TREATMENTS. USE OF WATER BASED POLYMERS BY OUR CUSTOMERS REDUCES HYDROCARBON EMISSIONS WHICH CAUSE SMOG.

VINYL CHLORIDE IS USED IN 25% OF OUR PRODUCTS TO SECURE CERTAIN DESIRABLE PROPERTIES, SUCH AS TOUGHNESS AND WATER RESISTANCE. WE RECOGNIZE THE HAZARDS OF WORKING WITH VINYL CHLORIDE AND HAVE INVESTED OVER \$400,000 TO CONTROL VINYL CHLORIDE EMISSIONS IN A PLANT THAT COST SLIGHTLY OVER \$2,000,000 TO BUILD.

WE HAVE PROVIDED THE BOARD'S STAFF WITH COMMENTS ON EACH DRAFT OF THE PROPOSED RULE. THE STAFF HAS ACTED IN MANY CASES TO IMPROVE THE PROPOSAL. DESPITE THIS COOPERATION, WE BELIEVE THE PROPOSED RULE CONTAINS IMPERFECTIONS AND UNDULY PENALIZES OUR SMALL BUSINESS OPERATION. AS MANAGER OF THIS SMALL POLYMER PLANT, I AM IN THE SAME POSITION AS THE MANAGER OF ANY SMALL BUSINESS. I MUST MAINTAIN A PROFITABLE BUSINESS WITH LIMITED RESOURCES.

I AM HERE TODAY TO ASK FOR A REVISION TO PARAGRAPH (1) AMBIENT AIR MONITORING THAT WOULD EXCLUDE OUR PLANT FROM THE EXPENSIVE AMBIENT AIR MONITORING REQUIREMENTS OF THIS PROPOSED RULE. OUR PLANT IS SMALL IN SIZE AND HAS LOW POTENTIAL FOR VINYL CHLORIDE EMISSIONS. THE DISTRICT'S MONITORING VAN SAMPLED OUR FENCE LINE FOR TWO MONTHS. ALL SAMPLES WERE UNDER THE 10 PPB LIMIT. OUR PLANT ALREADY HAS AN AUTOMATIC AIR MONITORING SYSTEM THAT MONITORS 19 POINTS IN OUR PLANT ON A CYCLED TIME INTERVAL. THIS ANALYZER GIVES "REAL-TIME" DATA FOR ANY LEAK THAT MIGHT OCCUR AND PROVIDES AN ALARM FOR PLANT OPERATORS TO TAKE CORRECTIVE ACTION. WE BELIEVE THIS ANALYZER ENSURES OUR COMPLIANCE WITH THE

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CALIFORNIA AMBIENT AIR QUALITY STANDARD. THE 10 PPB 24 HOUR BAG SAMPLES SPECIFIED BY THIS RULE WOULD REQUIRE OUR SMALL PLANT TO INVEST \$50,000 IN LABORATORY FACILITIES AND EQUIPMENT, AND EMPLOY AN ADDITIONAL ANALYST TO DO THE MONITORING FOR \$30,000 PER YEAR ADDITIONAL COST. THE ONLY FUNCTION THIS ANALYZER WOULD PERFORM IS TO DOCUMENT A 24 HOUR SAMPLE THAT OCCURRED YESTERDAY. WE BELIEVE OUR PRESENT COST EFFECTIVE CONTROL PROGRAM COUPLED WITH OUR SMALL SIZE PROVIDES PROTECTION FOR THE CALIF. AMBIENT AIR WITH A CONSIDERABLE MARGIN OF SAFETY.

ANOTHER ITEM I WOULD LIKE TO DISCUSS FOR THE BOARD IS PARAGRAPH (e) AIR POLLUTION CONTROL EQUIPMENT, WHICH RELATES TO CONTINUOUS STACK MONITORING REQUIREMENTS. OUR PLANT HAS A UNIQUE SITUATION WHERE OUR VENT STREAM, WHICH IS VERY SMALL, IS FED TO A NEIGHBORING UNION CARBIDE PLANT FURNACE, WHERE IT IS INCINERATED IN A RELATIVELY HUGE VOLUME OF COMBUSTION FUEL AND AIR.

OUR UNIQUE SYSTEM WAS APPROVED BY THE EPA, AND LATER ACCEPTED WHEN THE DISTRICT TOOK OVER FROM THE EPA. THE STACK WAS PERFORMANCE TESTED AND ZERO VINYL CHLORIDE DETECTED AS WITNESSED BY THE DISTRICT. IF OUR WAIVER IS NOW REMOVED, WE WILL HAVE TO INVEST \$150,000 AND SPEND \$25,000 ANNUALLY IN EXTRA OPERATING COST.

THIS SECTION STATES "THE EXECUTIVE OFFICER MAY WAIVE THE REQUIREMENTS OF THIS SUBSECTION FOR THOSE OPERATIONS FOR WHICH HE DEEMS THEM UNNECESSARY, AND SHALL NOTIFY THE BOARD OF GRANTING SUCH WAIVERS IN WRITING." THIS AUTHORITY BY THE EXECUTIVE OFFICER WOULD APPEAR TO PROVIDE THE MEANS OF RELIEF FOR OUR PLANT. IF THIS IS SO, WE ENDORSE THIS SECTION. WE WOULD PREFER TO HAVE PARAGRAPH (e) REVISED TO PROVIDE SPECIFIC DIRECTION TO THE EXECUTIVE OFFICER.

IN ADDITION TO THE OBJECTIONS WE HAVE TO THE MONITORING AND AIR POLLUTION CONTROL EQUIPMENT REQUIREMENTS OF THIS RULE, WE FEEL IT CONTAINS OTHER PROVISIONS WHICH ARE VAGUE, MEANINGLESS, OR UNSAFE AND SHOULD BE REDRAFTED. THESE ITEMS ARE POINTED OUT IN OUR WRITTEN SUBMISSION TO THE DISTRICT. WE RECOMMEND THAT THE BOARD DIRECT THE STAFF TO CORRECT THESE DEFICIENCIES AS WELL AS THE ONES I MENTIONED EARLIER, AND THAT APPROVAL OF THE RULE BE DELAYED UNTIL THIS IS DONE.

Los Angeles County
South Coast Air Quality Management District

1005.1 Rule Summary

1. The rule will be effective 12 months from adoption by the District; except:
 - a. Within three months a "Management Plan" for reduction of emissions must be submitted.
 - b. Within 60 days the leak detection plan must be initiated. No plant can operate with a "leak".
2. A "leak" is the detection of vinyl chloride exceeding 10 ppm over the background level, 5 centimeters from the source.
3. Equipment venting or appurtenances venting over 1 ppm vinyl chloride must be vented to a control device including: reactors, storage tanks, purification vessels, strippers, mixing-weighing tanks, holding tanks. (This provision of the rule would negate the use of the No. 3 cooling tank at Torrance which is not pressure rated and; therefore, negate the use of the No. 3 reactor. There may also be a problem with the various blend tank vents, which are now open to the atmosphere. Blend tank vent data is being gathered. The existing agitator seal on the No. 1 cooling tank may not be adequate.
4. Fence line concentrations of vinyl chloride may not exceed 10 parts per billion. The plant would have to provide and operate up to four air monitoring stations to determine 24 hour ambient air vinyl chloride measurements. The exact number and location is to be approved by the Air Quality Control District.
5. Our relatively low use of VC would exempt Torrance from the following
 - a. Up to four additional air monitoring stations must be maintained in the populated areas near the plant.
 - b. Meteorological data must be measured, summarized, and submitted to the District. A plant producing less than ten million pounds of vinyl chloride polymer in one year is exempted from this as well as (a) above.
6. Emission control devices must be operated to limit the total amount of vinyl chloride in the stack to less than 50 grams per hour. A continuous stack monitoring system, measuring flow rate and concentration of vinyl chloride must be employed.

There is a waiver provision that might make it possible to have our plant exempted from this requirement.

7. All vent valves and relief valves (except emergency relief valves) shall be vented to a receiving vessel.
8. Reactors and other equipment, upstream of the "stripper", shall be equipped with an automatic pressure reduction system, which will open at a pressure between operating pressure and the emergency pressure relief valve setting. The vapors from such pressure reduction systems shall be directed to a receiving vessel, vapor recovery system, or air pollution control system.
9. Scheduled inspections of flanges, pumps, valves, storage containers and process vessels shall be initiated. All leaks shall be recorded and records maintained two years. All leaks shall be eliminated within 24 hours.
10. If a plant can demonstrate compliance with 10 ppb fence line concentration continuously for six months, it can get an exemption from some of this rule except for the provisions for a Management Plan, Leak Detection Program, and fence line monitoring requirement. After getting an exemption, it can be voided by a violation of the 10 ppb requirement. This exemption would be "shaky" in my opinion and up to the whim of the "district."
11. Within six months of adoption of the rule, a schedule of progress for emission control must be submitted to the District Board for approval.

3/3/80 GWS

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