f. R-66 interpret.

cc: T. R. Matthews
J. M. Donatello -
C. D. Smith - Lincolnwood
J. W. Emrich - Lincolnwood
H. E. Batson - Wynnewood
C. M. Harmuth - Wynnewood
F. E. Schweitzer - Marshall Lab.
W. R. Hagist
W. S. Zimmt - Marshall Lab.
R. E. Austin - Legal
E. J. Sinser

October 5, 1973

C. M. SMYRK
WYNNEWOOD

LUCITE® WRA - AIR POLLUTION
REF. C.M.S. TO E.E.S. 9/24/73

I have discussed your September 24 letter with Otto Lin and he has advised that probably 30-40% of the H-641 remains in the film. More work is needed to confirm this opinion.

It is my opinion that the H-641 which becomes chemically bound in the film need not be included in the "volatile content" when calculating composition to determine whether more than 20% of the volatile content is an organic solvent. However, you should be prepared to prove that the H-641 remaining in the film is chemically bound, hense not available for emission to the air.

To my knowledge, this question has not been resolved by any of the APC agencies. If we hear of any official interpretations of this issue, we will let you know. As I am sure you realize, APC enforcement people may not agree with our opinion. You should carefully weigh the potential effect of an adverse ruling after a full-scale adoption of this finish by your customers.

E. E. SWAIN, JR.

EES:psb

N38273

P.S. - We are trying to get water-borne and hi-solids exemptions changed to 70;30 instead of 80;20 or to get the percentage changed to weight percent rather than volume percent. While this would apparently solve your problem, 6-12 months may be required to persuade the EPA and state agencies.

E.E.S.

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