B.F.GOODRICH CHEMICAL COMPANY MEETING REPORT

SUBJECT: SEPTEMBER ENVIRONMENTAL MEETING	DATE: 9/18/80
OUTSIDE ORGANIZATION INVOLVED:	
MEETING PLACE: Pedricktown	MEETING DATE: 9/10/80

BFG PARTICIPANTS	OTHER PARTICIPANTS (NO DISTRIBUTION)	ADDITIONAL COPIES TO: C.T.F.
J.W. Goetsch M.J. Slimbarski J.M. Fletcher C.W. Battle B.A. Prusinoski D.P. O'Keefe R. Purtell R. Hollis J.A. Kiel C.E. McCann		J.W. Lewis/J.D. Fannin/ R. Hall H. Waltemate Circulate-Environmental Committee File

RESULTS AND COMMITMENTS: | PERSON RESPONSIBLE:

1. Reviewed OSHA/EPA attainment for August
   - Personnel monitoring results look good in all areas
   - Compound personnel monitoring for lead and antimony will be recoded because of improper placement of pumps
   - Compound will resume millman dosimeter personnel monitoring
   - building monitoring improved, however, results are still less than goal

2. Reviewed EPA-NESHAP attainment for August
   - All results at 100%
   - Transmitted semi-annual report to EPA

3. Dennis O'Keefe reviewed importance of HNu calibration technique in order to obtain accurate finite readings.

4. Tim Manning is reviewing EPA permit conditions under expanded PVC capacity. New permit conditions will be incorporated into 1981 goals. Draft to be prepared for October meeting.

5. Reviewed agenda for vinyl chloride regulation review meeting scheduled for 9/17/80 with EPA and EPA's contractor TRW.

6. Highlighted key differences between Federal RCRA Hazardous Waste Regulation and proposed NJDEP Hazardous Waste Regulation. Comments are being prepared opposing these differences.

7. Reviewed complaint and unusual discharge procedure. Procedure will be re-issued with updated manufacturing area check sheets. It was emphasised that complaint investigation check sheets should be completed and returned to the lab by the end of the shift under all circumstances.

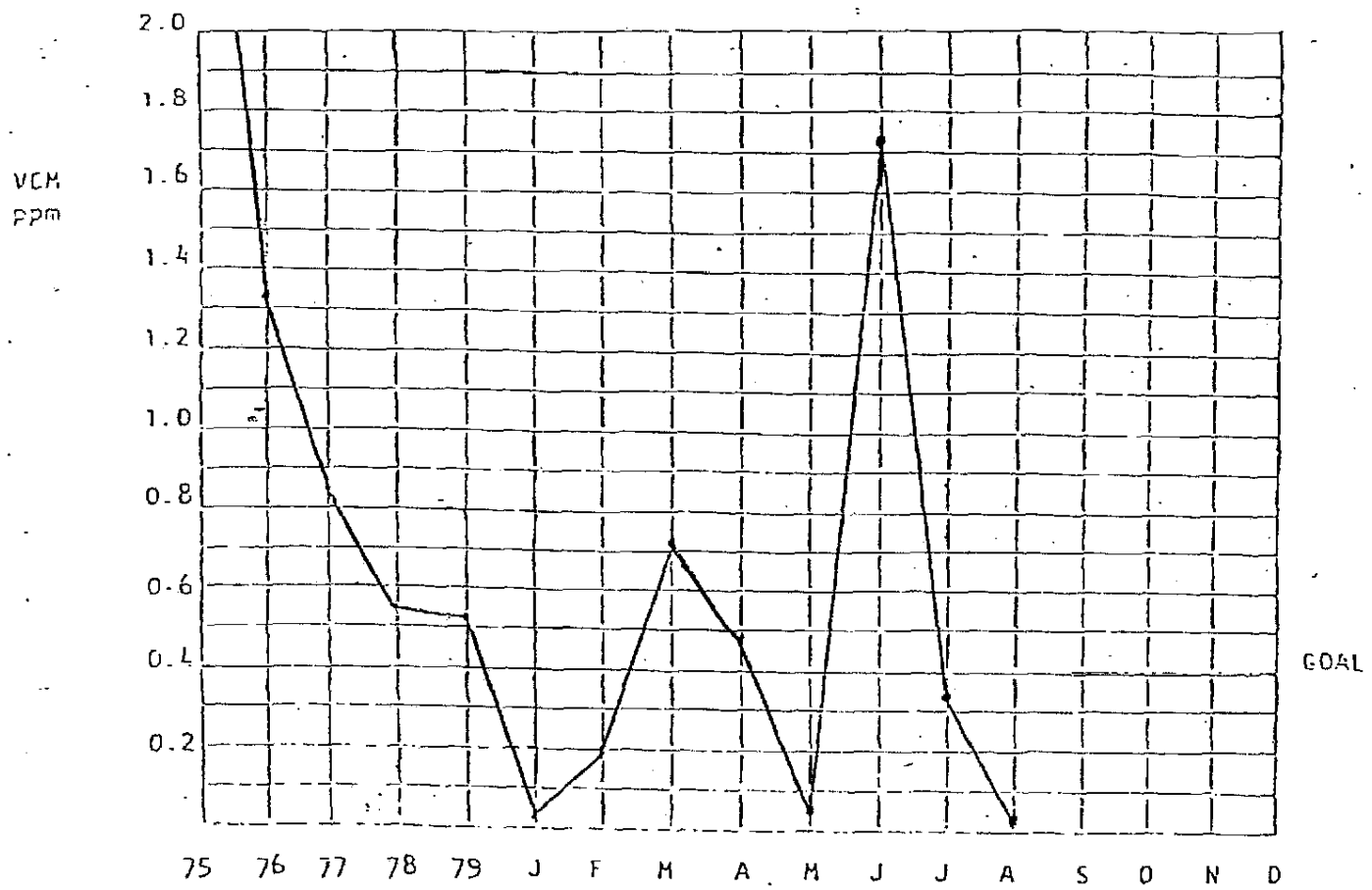
8. Reviewed NJDEP-Bureau of Air Pollution, Subchapter 12-Prevention and Control of Air Pollution Emergencies. Subchapter 12 revisions will be made in light of expanded PVC capacity.

NGC 14906

REPORTED BY: J.A. KIEL/re

VINYL CHLORIDE

MASS RESIN POLYMERIZATION - BLDG. 512



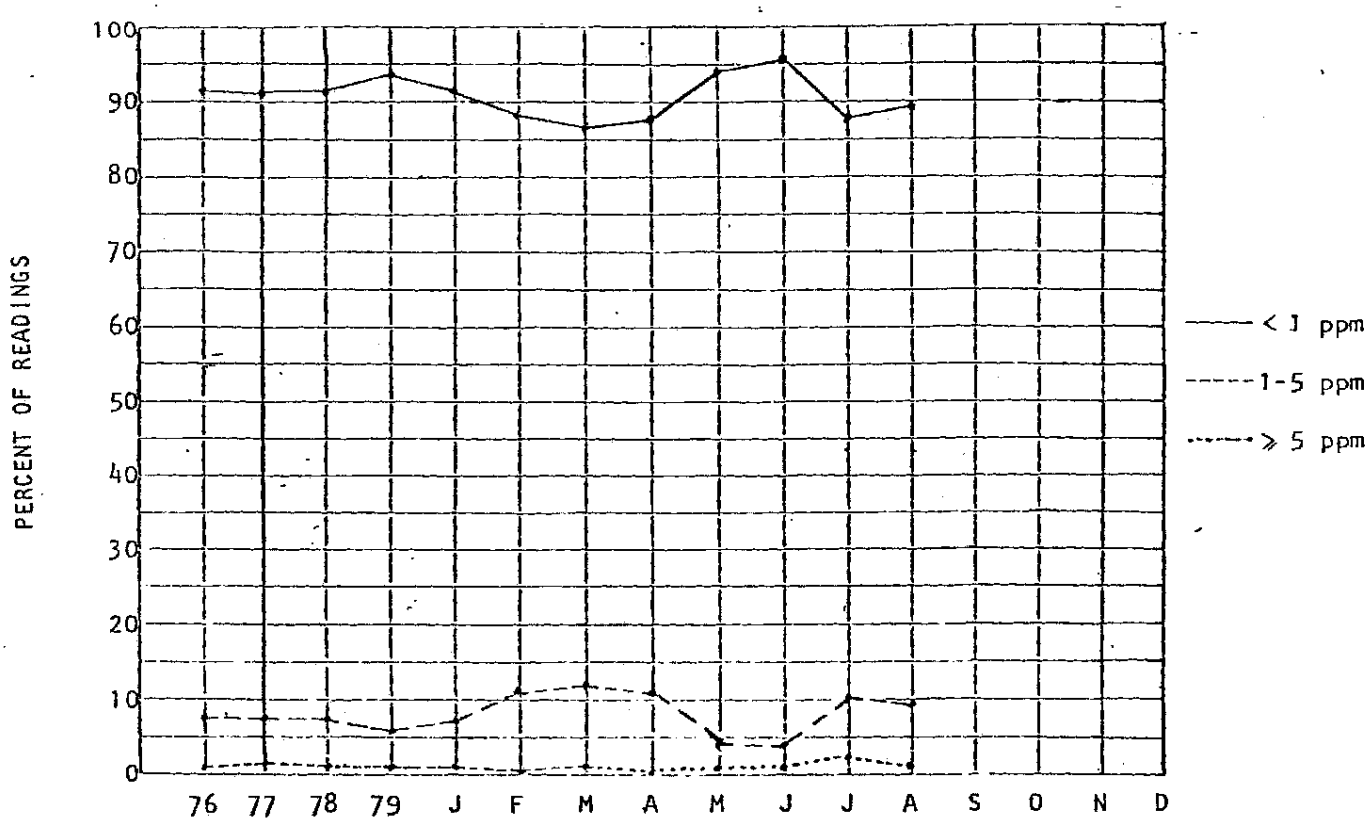
No. Samples	No. ≤ 0.5	0.5 < No. ≤ 1.0	No. > 1.0	Range ppm	Average ppm Month	Average ppm YTD	% ≤ 1.0 ppm Month	% ≤ 1.0 ppm YTD
14	14	0	0	.00-.15	.03	.43	100.0	92.7

NGC 14907

BUILDING MONITORING RESULTS

VINYL CHLORIDE

MASS RESIN POLYMERIZATION - BLDG 512



AUGUST 1980

	MONTHLY AVERAGE	YEAR TO DATE	GOALS
< 1 ppm	89.59%	90.06%	95.00%
1-5 ppm	9.46%	8.85%	4.49%
5-100 ppm	0.87%	1.05%	0.50%
≥ 100 ppm	0.09%	0.05%	0.01%
* Average ppm in building	0.81	0.70	

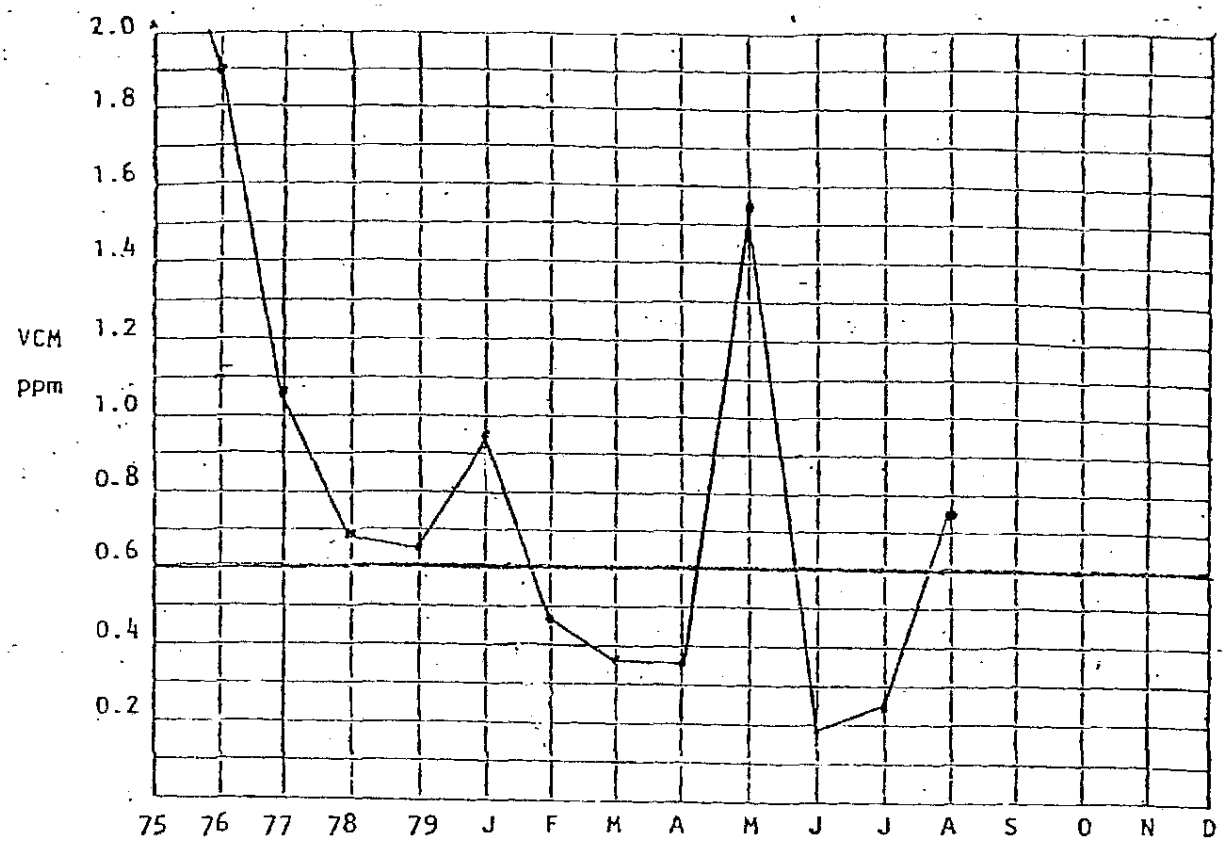
* Average ppm in building is calculated using the following assumptions: Any point less than 1 ppm = 0.2 ppm, any point between 1 and 5 ppm = 2.0 ppm, any point between 5 and 100 ppm = 17 ppm, and any point greater than 100 ppm = 330 ppm. These assumptions are based on actual levels for a one week period.

NGC 14908

PERSONAL MONITORING RESULTS

VINYL CHLORIDE

SUSPENSION/DISPERSION POLYMERIZATION - BLDG. 513



1980

No. Samples	No≤0.5	0.5< No.≤ 1.0	No. >1.0	Range ppm	Average ppm Month	Average ppm YTD	% ≤ 1.0 ppm Month	% ≤ 1.0 ppm YTD
21	18	0	3	.00-7.61	.75	.64	85.7	85.5

8/5 7.61 Vinyl leak during paste charging - respirator worn

6.03 Vinyl leak during paste charging - respirator worn

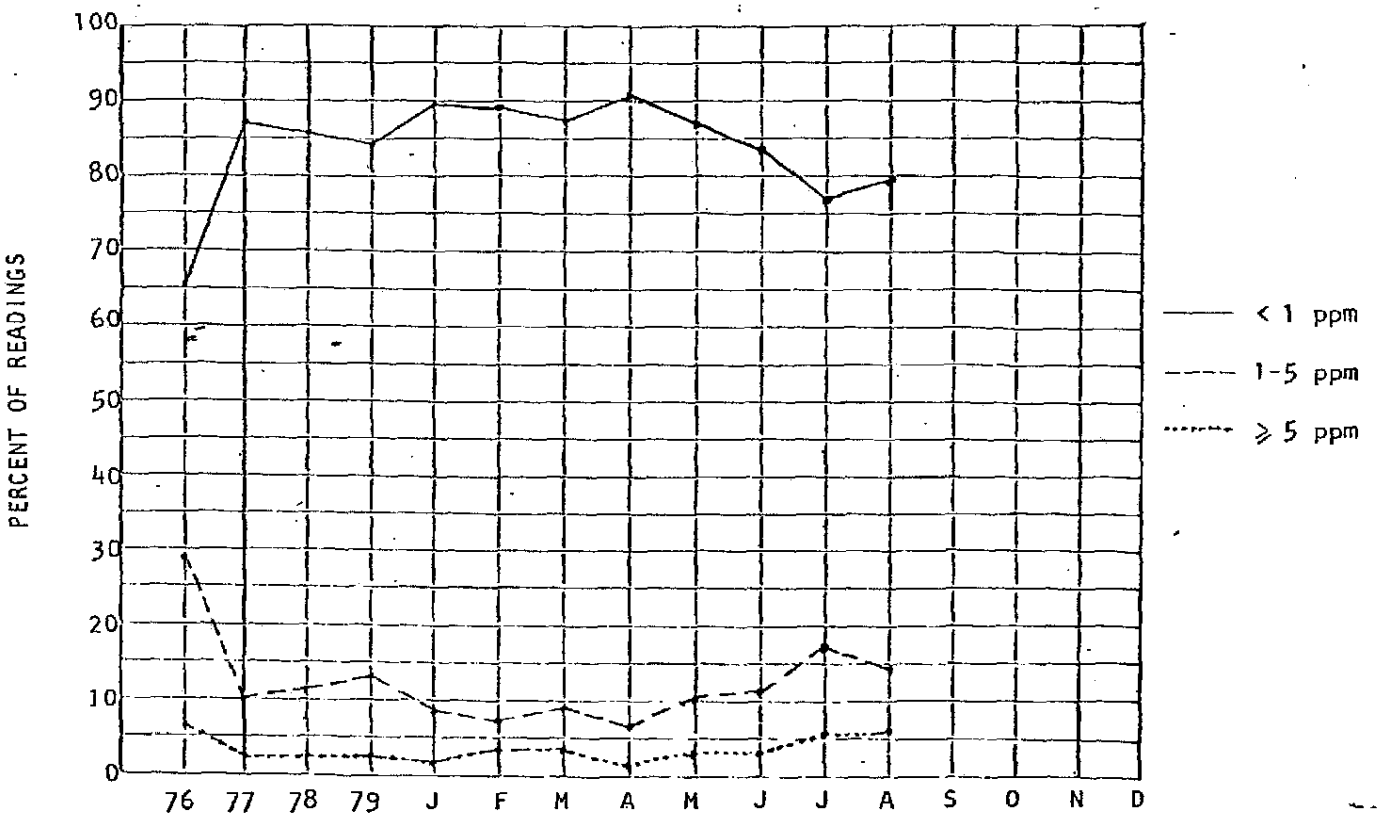
8/25 1.63 Drained wastewater stripper - respirator worn

NGC 14909

BUILDING MONITORING RESULTS

VINYL CHLORIDE

SUSPENSION/DISPERSION POLYMERIZATION - BLDG 513



AUGUST 1980

	MONTHLY AVERAGE	YEAR TO DATE	GOALS
< 1 ppm	79.74%	85.24%	90.00%
1-5 ppm	13.92%	10.98%	8.00%
5-100 ppm	5.84%	3.51%	1.90%
≥ 100 ppm	0.51%	0.27%	0.10%
* average ppm in building	3.11	1.89	

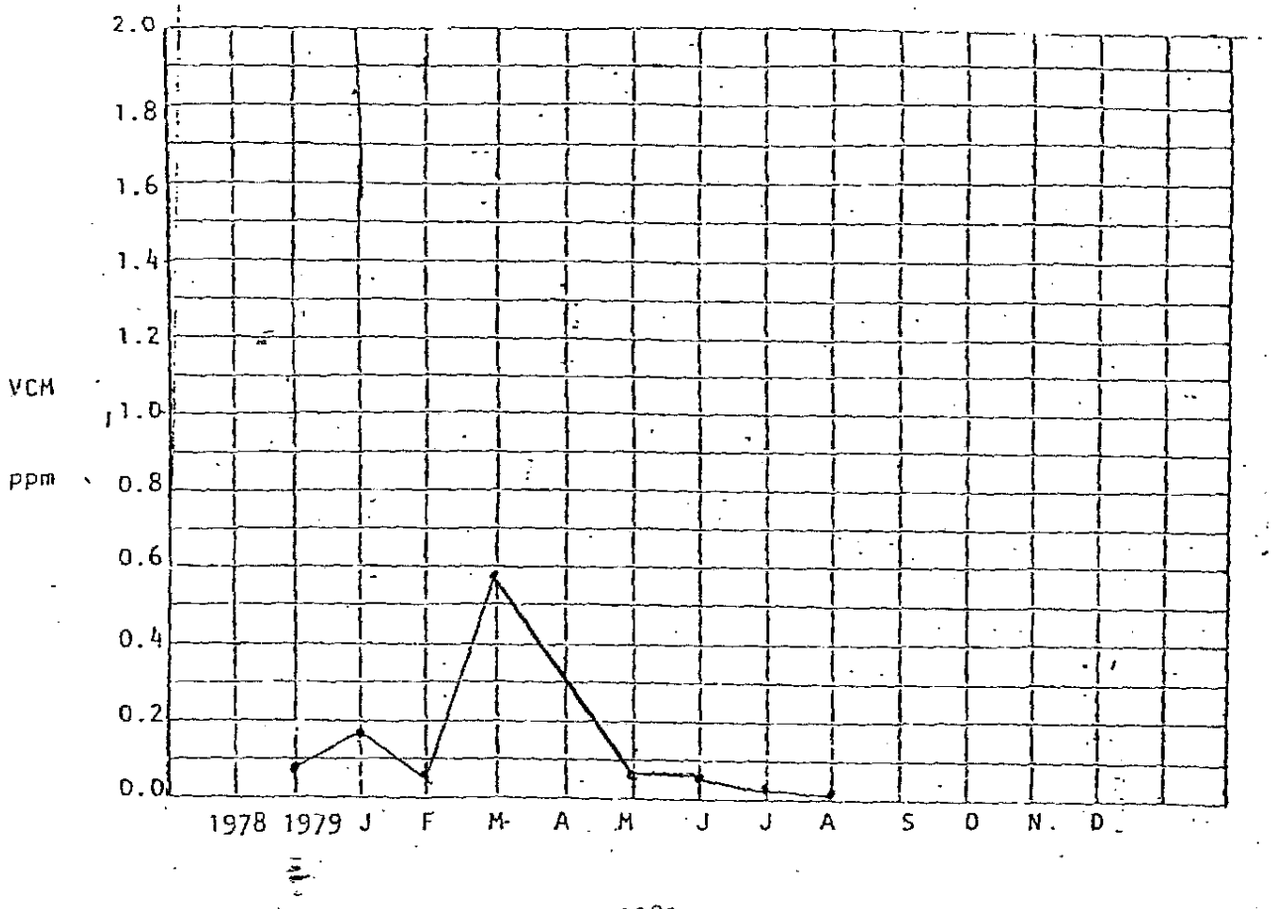
NGC 14910

* Average ppm in building is calculated using the following assumptions: Any point less than 1 ppm = 0.2 ppm, any point between 1 and 5 ppm = 2.0 ppm, any point between 5 and 100 ppm = 17 ppm, and any point greater than 100 ppm = 330 ppm. These assumptions are based on actual levels for a one week period.

PERSONAL MONITORING RESULTS

VINYL CHLORIDE

MAINTENANCE EMPLOYEES



NO. Samples	No. ≤ 0.5	0.5 < No. ≤ 1.0	No. > 1.0	Range ppm	Average ppm Month	Average ppm YTD	% ≤ 1.0 ppm Month	% ≤ 1.0 ppm YTD
17	17	0	0	.00-.03	.01	.13	100.0	95.7

NGC 14911

EPA - NESHAPS VC1 ATTAINMENT

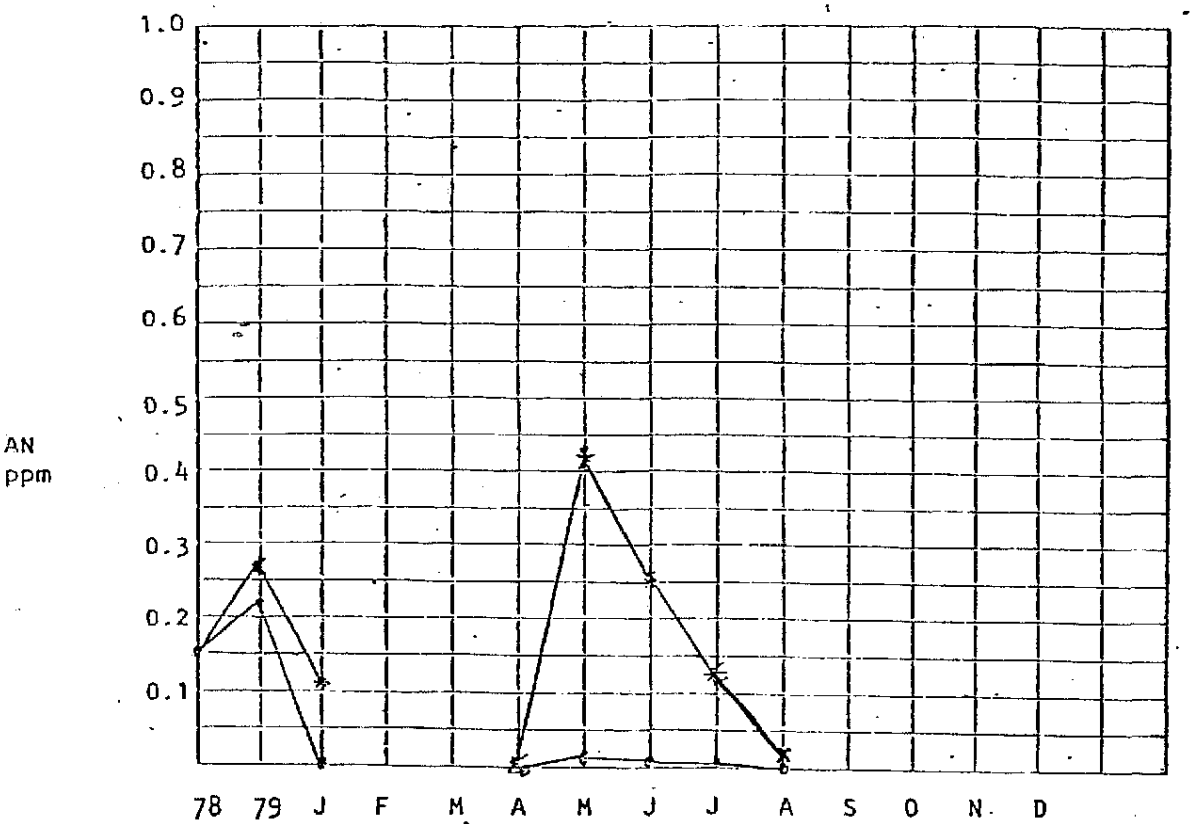
REACTOR OPENING	AUGUST 1980	SEMI-ANNUAL REPORT TO DATE	2/1/80-7/31/80
PEARL			
No. reactors opened	42	42	215
No. non-attainments	0	0	0
% attainment	100%	100%	100%
PASTE			
No. reactors opened	136	136	828
No. non-attainments	0	0	0
% attainments	100%	100%	100%
MASS			
No. reactors opened	140	140	1302
No. non-attainments	0	0	0
% attainments	100%	100%	100%
RESIN STRIPPING			
Pearl - % attainment	100%	100%	100%
Paste - % attainment	100%	100%	100%
Mass - % attainment	100%	100%	100%
VENT GAS ABSORBER			
% attainment	100%	100%	99.4%
Hours out of compliance	0	0	25
WASTEWATER STRIPPER			
% attainment	100%	100%	100%
UNUSUAL RELEASES			
No. EPA reportable	0	0	3

NGC 14912

PERSONNEL MONITORING RESULTS

ACRYLONITRILE

LATEX - BLDG. 502



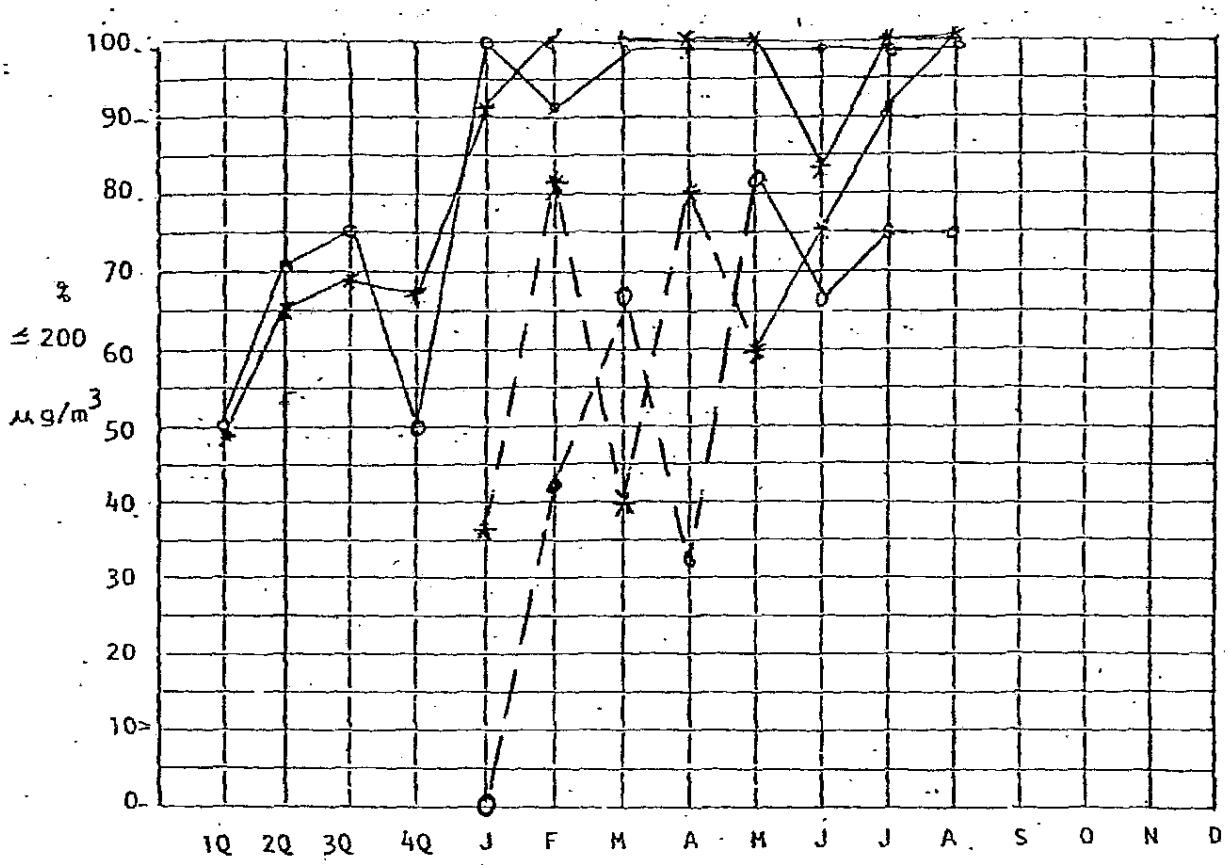
	NO. SAMPLES	NO ≤ 1.0	1.0 < NO ≤ 2.0	NO > 2.0	Range ppm	Average Month	ppm YTD	% ≤ 1.0 ppm
*REG	1	1	0	0	.02	.02	.21	92.3
) NON-REG	1	1	0	0	.00	.00	.01	100.0

NGC 14913

PERSONNEL MONITORING RESULTS

LEAD

COMPOUNDING - BLDG. 541



1979 1980

	No. of Samples	<50 µg/m³	50-200	>200 µg/m³	% < 50 M	% < 50 YTD	% < 200 M	% < 200 YTD
Weighman	3	3	0	0	100.	69.6	100.	98.2
Mixer	4	3	1	0	75.0	48.1	100.	98.1

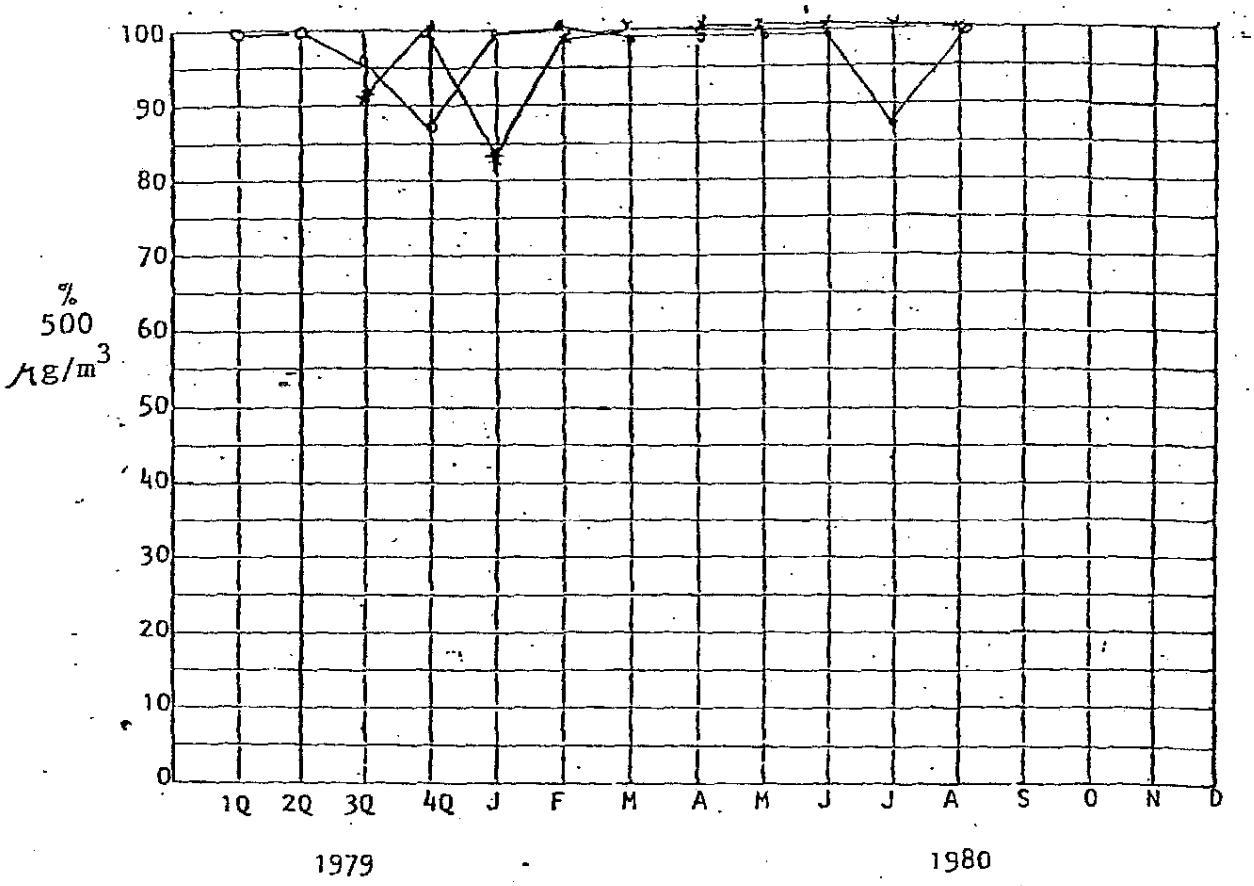
8/11/80 Mixer 159.80 µg/m³

NGC 14914

PERSONNEL MONITORING RESULTS

ANTIMONY

COMPOUNDING - BLDG. 541



	NO. SAMPLES	≤ 500 µg/m³	> 500 µg/m³	Month%	YTD
* WEIGHMAN	3	3	0	100.0	98.0
O MIXER	4	4	0	100.0	97.7

NGC 14915

KEY DIFFERENCES BETWEEN RCRA AND PROPOSED NEW JERSEY HAZARDOUS WASTE MANAGEMENT REGULATIONS

	RCRA	NJ	EFFECT ON PEDRICKTOWN
DEFINITION OF HAZARDOUS WASTE	Waste is toxic if listed or if the leachate contains specific concentrations of heavy metals or pesticides	waste is toxic if it is toxic under RCRA or if the waste contains any of over 400 hazardous constituents. Will be handled on case-by-case basis by NJDEP	waste treatment sludge, PVC reactor cleanings Latex floc and coagulum and Compound waste may become hazardous under NJ rules, potential severe economic impact
HAZARDOUS WASTE CRITERIA	waste is corrosive if ph $\leq$ 2.0 or $>$ 12.5	waste is corrosive if ph $<$2.0 or $>$12.0	no major effect
	water used in extraction procedure to have pH=5.0	water used in extraction procedure to have pH=4.0	effect unknown
GENERATOR RESPONSIBILITIES	Generator must utilize registered facility	generator must have written approval from hazardous waste facility prior to shipment of specific waste	BFG would have to pre-register all hazardous wastes with hazardous waste disposal firms
TRANSPORTER RESPONSIBILITY	hauler must obtain EPA identification number	out-of-state hauler must be registered with NJDEP as well as with EPA	no major effect

CEM/re
9/9/80

EPA - VINYL CHLORIDE REGULATION REVIEW

9/16/80 W.C. HOLBROOK TO REVIEW PRESENTATION AT PRE-SESSION

9/17/80 PRESENTATION OF PLANT COMPLIANCE PROGRAM

- PROCESS REVIEW WITH EMISSION POINTS

  MASS
  SUSPENSION - EXISTING AND LARGE POLY
  DISPERSION

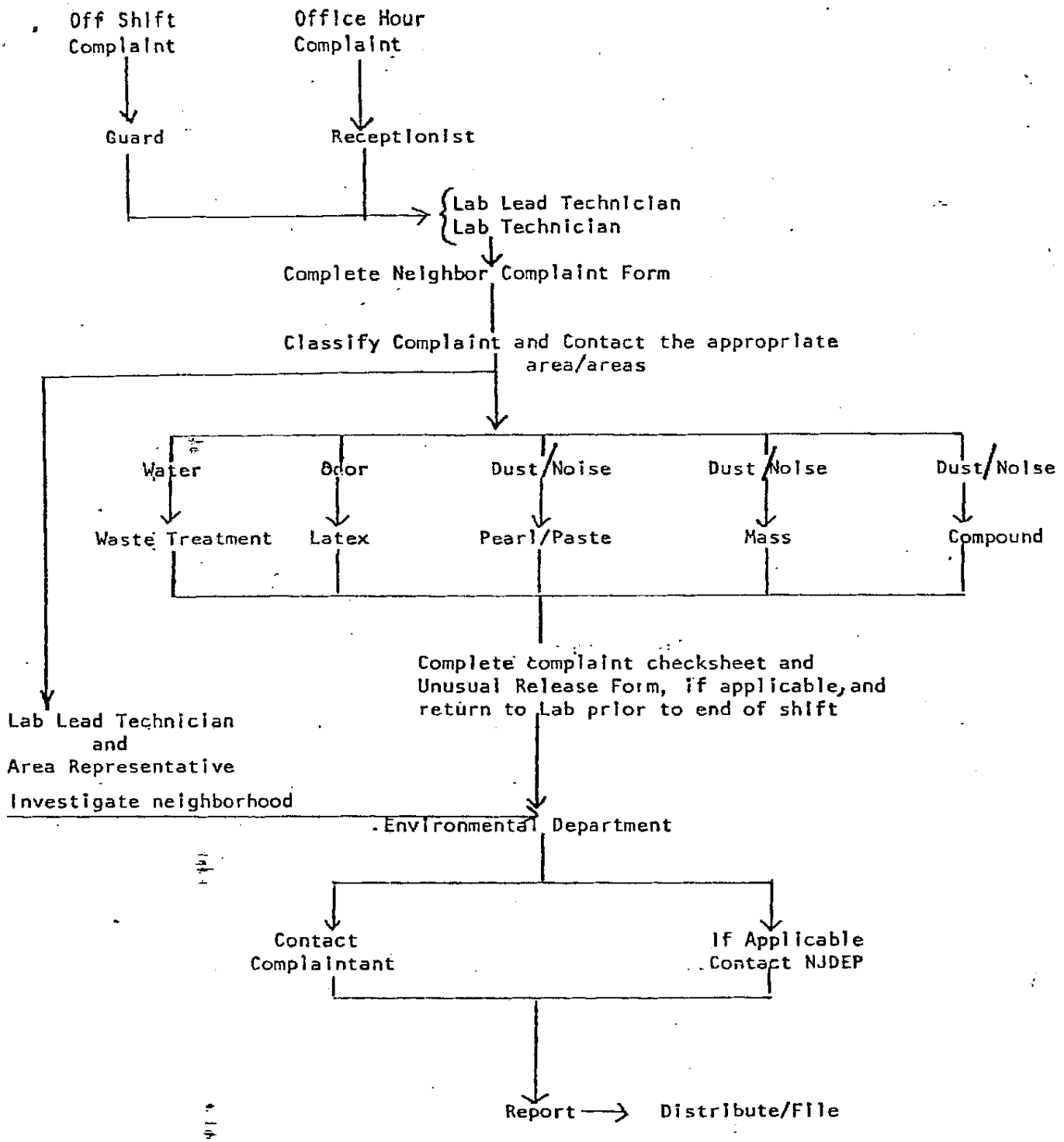
- VCM EMISSION CONTROLS

  RESIN STRIPPING
  REACTOR OPENING/EQUIPMENT OPENING
  WASTEWATER STRIPPING
  VGA
  INCINERATOR
  FUGITIVE

- VCM REGULATION MODIFICATION RECOMMENDATION

- PLANT TOUR OF PVC MANUFACTURING

JAK/re
9/9/80


Off Shift Complaint
Office Hour Complaint
Guard
Receptionist
Lab Lead Technician
Lab Technician
Complete Neighbor Complaint Form
Classify Complaint and Contact the appropriate area/areas
Water
Odor
Dust/Noise
Dust/Noise
Dust/Noise
Waste Treatment
Latex
Pearl/Paste
Mass
Compound
Complete complaint checksheet and Unusual Release Form, if applicable, and return to Lab prior to end of shift
Lab Lead Technician and Area Representative
Investigate neighborhood
Environmental Department
Contact Complaintant
If Applicable Contact NJDEP
Report
Distribute/File

NGC 14918