

Interoffice Communication

To R. E. Lehkmuhl
From J. J. Hall
Date May 2, 1983
Subject MONTHLY ACTIVITY REPORT - ENVIRONMENTAL DEPARTMENT

LAKE CHARLES WASTE DISPOSAL

We have still not received the "concepts document" from BFI. We are told that it should be sent any time.

BFI's existing landfill in the Lake Charles area at Willow Springs is receiving pressure from local citizens to be closed down quickly rather than over a 18 month period.

Design and cost estimation for installation of a synthetic liner at the LCCP landfill are in progress.

PETERSON LAWSUIT

Conoco has been brought into this lawsuit at Chocolate Bayou as expected. We are working with Legal and the plant to develop our defense strategy. Trial is currently set for July, but we will probably ask for a continuance.

ETHYLENE OXIDE

On April 21, OSHA published a NPR for ethylene oxide. As expected it contained a 1.0 ppm PEL. It is a specification standard, with requirements for monitoring (initial survey and routine), medical testing, education, signposting and labeling, written compliance and emergency plans, and establishment of regulated areas.

The EOIC is formulating comments. Conoco will likely submit comments also. Some major areas of comment are the suggestion of genetic screening in an appendix to the standard, the text required on the signs, and the analytical problems for EO air samples.

The business area has determined that in view of current capabilities for reducing residual EO levels to <1.0 ppm and what actions competitors are taking, no action will be necessary to further strip ethoxylates.

REGULATORY

Benzene - OSHA has announced that it plans to publish an Advance Notice of Proposed Rulemaking for benzene in May. Several days after the announcement OSHA was petitioned to publish an Emergency Temporary Standard for benzene at 1.0 ppm for an 8-hour TWA and 5.0 ppm peak exposure limit. OSHA has not taken any action or commented on the petition.

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Based on preliminary results of two toxicology studies and a recently published risk assessment document, it appears OSHA may have the data it needs to meet the Supreme Court mandate for justification to lower the standard.

EPA regulations for control of benzene emissions from fugitive sources (leaks) and storage tanks are scheduled to be finalized in October. Discussions are being held with affected plants (Baltimore, LAB, LC Ethylene, and Chocolate Bayou) to determine the impact and make plans for compliance.

Labelling - OSHA is expected to publish the final labelling standard in June. "Unofficial" drafts have been circulating, but the actual content of the final rule is unknown at this time.

WORKMENS COMP

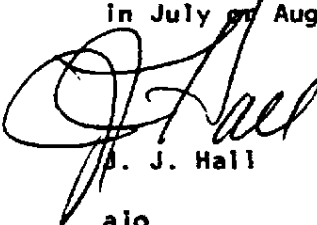
The Henry Bernoski case was settled. A meeting was held with insurance to improve communications.

CONOCO CHEMICALS TOXICOLOGY ASSESSMENT COMMITTEE MEETING

A meeting of the CCPTAC was held on April 14. Recent testing results for several ALFONICS were reviewed. Oral LD₅₀ work being done on 550L and 600L sulfonates is currently the only outstanding testing. The committee is working on an overall testing protocol and guidelines to include specific testing exposure periods and specific guidelines on inhalation testing.

MSDSs

Comments are still being received on the MSDS distribution and recordkeeping system. It is planned to do the first mailing to PVC customers in May. Based on the expected workload in Marketing administration, the mailings will have to be segmented by product area. The next planned mailing will be in July or August.



J. J. Hall

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