

To: (See Attached Distribution List) Date: August 9, 1974

From: Dr. A. B. Steele

Subject: Vinyl Resin Operations
Flash Report

Vinyl Chloride Monomer

Proposed Permanent Standard on VCM Emissions
Not Achievable Through Known Technology

The OSHA Act requires the Secretary of Labor to adopt feasible standards which are generally understood to represent technologically achievable conditions. In proposing the standard of a non-detectable exposure level with regard to vinyl chloride, the Secretary has not taken into consideration the overwhelming engineering and technological data which decisively establishes that the proposed exposure levels are not attainable through engineering controls and work practice methods; the standard simply cannot be implemented by such means.

During the past two months, the Operations group has reviewed the most advanced engineering technologies and systems design presently known. It is our judgement that it is technologically impossible to meet the non-detectable exposure level required by the proposed standard through engineering and technological means regardless of the amount of capital expenditure that might be made to improve and renew existing plants. This judgement leads to the conclusion that Carbide would have no alternative but to cease all polyvinyl chloride manufacturing operations if the proposed standard is adopted.

After analyzing the many complex engineering factors involved, we conclude also that it is presently impossible to predict whether any exposure level below 50 ppm can be reached until additional equipment has been installed and the designed changes accomplished. This conclusion has been communicated to Foster D. Snell under contract to OSHA to determine technical feasibility of the proposed standard.

1,400,000 pounds of vinyl chloride monomer was purchased from Robintech, Inc. to provide material owed Conoco for shipment in late August and early September as replacement for the Conoco lifting of a like amount of VCM to Brazil during July.

Inventory at South Charleston is 1,435 M pounds.

Suspension/Non-Solvent Resins

Suspension/Non-Solvent production is running at a 14.3 million pound monthly rate. Approximately two days of outage have been experienced so far this month in the suspension operation due primarily to VCM shortages but sixteen hours was due to a brine header failure. The plan for the month, including the various agreements for obtaining additional monomer will permit the production of approximately 14,100 M pounds of resin in PIC 282.

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Dispersion Resins

Production was 80% of plan due to mechanical failures on the drying system.

The new catalyst unit is 99% complete, and operating procedures are being written.

The Plant inspection for three days by OSHA proceeded smoothly.

A. B. Steele

AES:ml

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