

PLAINTIFF'S EXHIBIT

UC-P-40

DE 007447

TEXAS AIR CONTROL BOARD

WPA/SJF/MRF file

ENVIRONMENTAL PROTECTION/OCCUPATIONAL HEALTH

PRODUCTION MANAGER'S SUMMARY REPORT - SOUTHERN REGION

January 1979

REGULATIONS

Texas:

EPA Delegation of Authority for New Source Performance Standard (NSPS) as well as National Emission Standards for Hazardous Air Pollutants (NESHAPS) review has been granted to the Texas Air Control Board.

The Linear Alcohols Production Department requested an amendment to TACB Order 74-3 involving the distillation of a concentrated waste stream for odor controls. Since the product mix for this unit no longer contributes to the odor problem for which the waste distillation was originally required, we requested deletion of that requirement to improve operating effectiveness. The facts were reviewed at both local and state levels and agreement reached on a technical basis to allow staff presentation of an amended Board Order for TACB approval in February without the necessity of a public hearing.

An EPA Brownsville plant audit was conducted in January. No problems were found. Special emphasis was placed on PCB procedures and little emphasis on asbestos handling. Concurrently, an EPA sample team took composite samples for toxic compound analyses.

A construction permit exemption was requested from the Texas Air Control Board (TACB) for the Seadrift Low Pressure Polyethylene Catalyst Precursor Storage System.

The TACB has determined that both the "G" prototype and G-5000 LPPE Resin Degassing Systems are exempt from construction permit procedures. The EPA has also determined that the two systems are exempt from PSD Review for hydrocarbons. However, EPA indicated that potential particulate emissions (from the "G" Prototype) exceeded 100 tons per year and will require PSD Review for particulates.

The TACB was issued a fourth quarter report covering the "Solid Catalyst Storage Facilities" for LPPE. The project is 90% mechanically complete with the start-up forecasted for March, 1979.

Louisiana:

The LACC did not approve the Louisiana SIP at the January 30 meeting. Instead, an additional 10-day public comment period was granted. The SIP will probably be adopted at the March 27 LACC meeting.

Puerto Rico:

Puerto Rico's SIP Public Hearings were held on January 15. Caribe comments were part of the P.R. Manufacturers Association input emphasizing mainly the hydrocarbons concern expressed on the Air Regulations hearings.

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WATER

Brownsville: Radian Corporation analyses of seawater for PCB's in the Port of Brownsville area indicate that levels are less than 1 ppb (detectable limit 0.1 ppb) and that UCC is not a contributor. The EPA limit for PCB in water is 1 ppb. A summary report will be issued.

Seadrift: Two permit excursions occurred at the Clean Water Discharge, Outfall 002. Both excursions were due to high TOC.

Sampling for GC/MS analysis on the winter operations of the waste-water system was conducted in late January. Also, three samples of the Goff Bayou fresh water supply were taken for GC/MS analysis. The results should be available at the end of February.

Texas City: There was one stormwater violation on pH.

GCWDA met all the effluent permits for January. Separation of UCC and Monsanto waste prior to initial treatment has helped. This was the fourth coldest January in history.

Taft: The NPDES permit was met for all parameters for the month of January, but it was necessary to implement the winter contingency plan to lower inlet loads. The Glyoxal unit was shut down early in the month and the Butadiene unit was not allowed to run during the last week of the month. Additional curtailments were not required due to the excellent results on the part of the production units in holding organic and hydraulic loads to a minimum. These reductions were needed due to (1) reduced performance in the WWTP caused by cold weather and (2) high hydraulic levels resulting from the TSS problems experienced in December.

Improvements made to the polymer injection systems after mid-January significantly improved TSS control at the WWTP secondary clarifiers and decreased the polymer required to control TSS.

Tretolite began adding polymer to one WWTP primary clarifier on January 10 and Betz began adding polymer to a different clarifier on January 16. As yet, no significant reduction of soluble COD in the clarifier effluents has been noted.

Addition of PHENOBAC dried mutant bacteria to the UNOX reactors was resumed in mid-January. No significant effects were seen by the end of the month.

On January 16, EPA visited the plant for "round two" of their effluent guidelines sampling program. Process sewer samples were taken from the sumps of nine production units. Samples of the WWTP influent, UNOX feed and UNOX effluent were also taken. EPA will return in late February for three days of composite sampling.

DE 007450

Ponce: A test is being run with a surface aerator which has the Rex impeller. The test consists of running the aerator with three 55-gallon drums attached to each floating pontoon to improve its stability. This aerator has been running very steadily since 1-30-79, pulling about 75 amps and no peak loads.

The Caribe Plant NPDES team met in January. The following decisions were made to accomplish the team's action plans:

- a. To waste secondary sludge to the landfill and operate the presses so the bacteria in the mixed liquor gets down to 4000 ppm. A total of 300,000 gallons of this sludge was wasted during the month.
- b. Relocate the filtrate water to the biological ponds. A new line was installed and put in operation on 1-30-79, this to reduce the TSS in the effluent from the WWTP.
- c. Start checking the production units' effluents for the ten NRDC toxic compounds found in higher concentration in the WWTP effluent and for those compounds found in concentrations higher than 10 ppm in the WWTP influent.

AIR

Brownsville: The plant EIA is updated and the "Summary of Ratings" is being reviewed by Plant Management. These ratings will be forwarded to EP engineering for use in evaluating the impact of the proposed energy systems expansion.

Seadrift: A semi-annual report for Air Emission Inventory was supplied to the Louisiana Air Control Commission for the UCAR pipeline compressor station at Napoleonville.

Taft: EPA Region VI has given verbal approval of the PSD monitoring network proposed by the St. Charles Environmental Control Assn. (SCECA). The network will consist of three monitoring stations and a meteorological station. Ambient levels of SO₂ and TSP will be measured at stations 1 and 3. SO₂, TSP and NO_x will be measured at station 2, the station nearest Taft.

RESIDUES/SOLIDS

General PCB's: All locations reported being in compliance with (a) Marking, (b) Record keeping, and (c) Storage requirements of the PCB Regulations. The location "Exposure and Contamination Plans" will be required (best estimate) around April 1.

DE 007451

Environmental Protection/Occupational Health Production Manager's
Summary Report - Southern Region - January, 1979
Page 4

Taft: Approximately 258M pounds of residues were burned in the EPD ground burner due to boiler burning curtailment.

Ponce: The Mangrove Restoration Plan was received from the consultant for review. It is now ready to be submitted to the Corps of Engineers.

Seadrift: The Annual Industrial Waste Disposal Summary was supplied to the Texas Department of Water Resources. A total of 8071 tons of solid were disposed of in the landfill and 237,754 gallons of liquid residues were disposed of in the ground burners.

National Soils has been contracted to begin a study in mid-February to determine the source and extent of solid contamination between the old burning pit area and Goff Bayou.

Texas City Purchasing has finalized the contract with Waste Management of Alabama for the landfilling of solid wastes containing PCB's currently being stored at the Seadrift Plant.

INDUSTRIAL HYGIENE

Texas City: A C&P SID representative reviewed the Plant Radiation Protection Program. No major deficiencies were noted.

An OSHA Industrial Hygienist was in the plant on 1/8/79 as a follow-up to 12/13/78 complaint. He performed carbon tube personnel monitoring in the drumming room and also interviewed five product handlers. At the time he left, he stated that no further work would be done until results were returned from his lab.

The Marine Terminal will not have to train for Acrylonitrile if polymer polyols maintain the AN concentration at 100 ppm or lower.

Ethylene oxide monitoring has been completed at Ethyleneamines, Ethylene Oxide Derivatives Unit, and In-Plant Distribution. Elevated concentrations were detected during filter change operations at In-Plant Distribution. A computer report of the survey results will be forthcoming.

Lead exposures of the lead burners, sandblasters and painters were monitored. Results indicate some levels exceed the new proposed permissible exposure level of 0.05 mg/M³ as stated in the OSHA Lead Standard.

Diethyl Sulfate exposure during drumming operations was monitored at the In-Plant Distribution drumming line. A short-term personnel sample was slightly above the 1 ppm level. Monitoring will be continued in this area during future DES drumming.

DE 007452

The method of sampling and analysis for hydroquinone developed at the Texas City Industrial Hygiene Laboratory was submitted to the C&P I.H., Methods Development Task Group, along with methods of analysis that are used here for lead in air, urine, and blood for possible inclusion into Volume 38, Industrial Hygiene Handbook.

Seadrift:

In cooperation with the Seadrift Plant Ethylene Oxide Personnel Exposure Team, the following areas were monitored in January, 1979:

Oxide II: Four operators and six maintenance personnel were monitored for possible ethylene oxide (ETO) exposure during the Oxide II Unit start-up on January 19 and 20, 1979. The results of samples collected showed ETO exposures ranging from <0.1 to 1.1 PPMv.

Oxide Derivatives Unit (ODU): Six area and personnel ETO samples were collected during ETO instrument lead blowing. ETO exposures ranged from <0.1 PPMv to 3.3 PPMv.

Environmental Protection: The Environmental Protection Department waste water sample collected was monitored for possible ETO exposure. The ETO exposure on both days was ≤ 0.2 PPMv.

Respirator Testing: A letter describing half mask-charcoal cartridge test results at Load Rack 3 was published. Test results showed that charcoal provided protection below the 10 PPM ETO guideline. Further R/D testing is recommended.

A radiation review was made of the Plant Radiation Protection Program.

Ponce:

Volatiles (ethanol and benzaldehyde) from the extrusion of a special resin at Polyethylene Unit was run using a Miran infrared spectrometer. Monitoring revealed an average of 3 ppm of ethanol and negligible content of benzaldehyde. Volatiles were low enough as to present no excess exposure to personnel.

The Butanols, Olefins and Acetylene Black Units were surveyed for noise. Installations of the new signs "Ear Protection at all Times" and removal of old signs are almost complete.

The second Occupational Health Bulletin was published for employees. It highlighted Ethylene Oxide Exposure Effects.

New rotary valves were installed in the Benzene OH Van. Operation has been curtailed due to high pressure gas leaks in the system.

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DE 007453

ENVIRONMENTAL PROTECTION/OCCUPATIONAL HEALTH
PRODUCTION MANAGER'S SUMMARY REPORT - SOUTHERN REGION

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