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ALLIED CHEMICAL CORPORATION

MEMORANDUM

May 30, 1974

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SUBJECT: EPA Action - Vinyl Chloride

It is expected that on June 6 or 7 Russell Train of the EPA will hold a press conference reporting on EPA activity to define necessary controls for vinyl chloride. Reportedly, EPA sampling adjacent to monomer and polymer plants has indicated "high" concentrations of vinyl chloride. Word is that Train will condemn industry as not having taken sufficient steps to control vinyl discharges and states that concentrations are well below those which would be indicated by emission survey data. He will use vinyl chloride as an example to Congress as to why the Toxic Substances Act should be passed.

At the present time, the vinyl chloride investigation lead rests with the Office of Toxic Substances headed by Schweitzer. The EPA believes that the primary problem is in the air area and, as such, the Durham offices will be given the lead position. Action by them will be:

- a) Visits to key monomer and polymer plants to conduct actual testing and obtain industrial estimates of emission levels. A contractor (Houdry) will assist.
- b) Houdry will determine the cost for air pollution controls.
- c) The EPA will determine the level of control needed. At this time, their preliminary thinking will be based on achieving a concentration of ≤60 ppb.
- d) The EPA Strategy for Air Standards Division indicates that vinyl chloride would be cited as a hazardous pollutant with the establishment of Federal emission standards being proposed within three weeks. The Houdry study is being managed by L. Evans of the EPA and it is expected that Allied will be one of the firms contacted. There is some concern that high fugitive losses of VCM could lead to the establishment of an ambient air standard. However, this is doubted.

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Fence line testing by the EPA in several regions has shown "high" (?) levels of vinyl chloride. Levels may be on the order of 2-10 ppm and are far in excess of what would be calculated by the dispersion equations. However, this is understandable because of the high molecular weight of vinyl chloride and the normally short stack heights used as emission points. The writer's experience has shown that it is most difficult to disperse vinyl chloride. It may travel at ground levels for distances of several hundred yards before being dispersed. The regional EPA representatives are meeting in Atlanta next week to submit preliminary control recommendations in time for Train's news conference on June 6 or 7.

MCA activity in the vinyl chloride area has been limited primarily to the OSHA problem. There is feeling within MCA that the vinyl chloride problem does not cover enough of the member companies to mandate strong MCA response. There have been a considerable number of statements made that the SPI should be the umbrella for industrial activity.

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FOR IMMEDIATE RELEASE

EPA Requests Vinyl Chloride Data From Manufacturers

MAY 31--The Environmental Protection Agency has requested "process, emission and air quality data" from the 27 U.S. manufacturers of vinyl chloride a gaseous chemical, and polyvinyl chloride, a plastic derived from the gas.

The information is being sought from 14 vinyl chloride and 35 polyvinyl chloride plants operated by these 27 companies.

EPA said in letters to the manufacturers dated May 30, 1974, that the Agency is "gathering information for possible use in the development of air pollution control standards for vinyl chloride in accordance with the Clean Air Act of 1970."

EPA is now taking atmospheric samples near polyvinyl chloride and vinyl chloride plants to determine amounts of the gas present in the ambient air. The monitoring data will be available to the public as soon as it has been processed and verified. At present, no Federal air pollution control standards exist for vinyl chloride. The EPA request for information from the manufacturers covers three areas:

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1) Identification of emission points in the manufacturing process and the amounts lost from those points. The identification of emission control procedures that have been or could be instituted and an evaluation of their effectiveness are also being sought.

2) Cost and economic data including the capital and operating costs for each emission control device or procedure.

3) Ambient air quality data which has been collected by the manufacturers near their plants.

EPA is requesting the information under the authority of Section 114 of the Clean Air Act, which enables the Agency to develop data needed for standard-setting pursuant to the Act.

Vinyl chloride has been implicated in 19 world-wide cases of a rare but fatal form of cancer, angiosarcoma of the liver, among workers engaged in the conversion of the chemical to polyvinyl chloride. Similar cancers also have been produced in experiments exposing rats and mice to vinyl chloride. In both cases, exposure to vinyl chloride gas occurred repeatedly over extended periods of time.

Today's action follows several steps already taken by EPA in an effort to protect the public from the potential adverse effects of vinyl chloride.

-- February 14, 1974, Administrator Russell E. Train formed an internal task force to assess the overall environmental impact of the chemical.

-- April 5, 1974, EPA notified the producers of all pesticides with aerosols containing vinyl chloride of the need to substitute another propellant.

-- April 10, 1974, EPA Regional Administrators were asked to assess the extent to which vinyl chloride is escaping beyond the confines of the polyvinyl chloride production facilities in their regions.

-- April 17, 1974, EPA released the brand names of 20 pesticides containing vinyl chloride.

-- April 24, 1974, EPA suspended from sale and requested a recall of all pesticide aerosols for indoor use containing vinyl chloride.

Based on the April 5 notice and a follow-up of April 30, all of the manufacturers of pesticide aerosols containing vinyl chloride either have substituted or are now in the process of substituting an alternate propellant.

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Companies contacted by EPA:

Air Products Chemicals, Inc.
American Chemical Corp.
Borden Chemical, Inc.
Continental Oil
Diamond Shamrock
Ethyl Corp.
Firestone Plastics
General Tire & Rubber
B.F. Goodrich Chemical Co.
Goodyear Tire & Rubber
Great American Chemical Co.
Hooker Chemical
Keysor-Century Corp.
Monsanto
National Starch & Chemical Co.
Olin Corp.
The Pantasote Co. of New York, Inc.
Robintech, Inc.
Stauffer Chemical
Tenneco Chemicals
Union Carbide
UniRoyal, Inc.

Allied Chemical
Dow Chemical
Monochem, Inc.
PPG Industries, Inc.
Shell Chemical

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