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ASHC
5-16-85

UNIROYAL CHEMICAL
Division of UNIROYAL, Inc.

CONFIDENTIAL

May 9, 1975
cc: JJT - Naug.
ACW - Naug.

TO: G. A. Anderson
Naugatuck

FROM: B. R. Leach
Painesville

SUBJECT: Marvinol Status

At the Division Staff meeting of May 2nd I had many more charts available than I needed to use. It did not fit the presentation that the SPD Board chose to make for me to present the detail covered by these charts. Nevertheless consideration of the data contained is important in determining the timing of the Marvinol decision. It occurs to me for instance, that certain of the concerns likely to be raised by Mr. Beretta or the Board of Directors relative to the status of our VC compliance might be answered by use of these charts. A set is therefore attached.

I feel that a few observations from the plant are appropriate for consideration as a decision is approached regarding the timing to implement the shutdown. These are:

1. Mr. Bommarito, President of the URW International, has indicated that he expects the PVC industry to be more interested in profits than in the safety of their employees. Continued procrastination on an early decision to announce that we will no longer manufacture PVC, if in fact we do not plan a commitment for adequate facilities for the manufacture of PVC, supports Bommarito's observation. This can lead only to certain embarrassment of Uniroyal if we are held up as an example of a company who exploits its employees.

You will see from the charts relating to VC concentration in Bldgs. 107, 117, 108, 414, and 415, that while we have made measurable progress in reducing VC concentrations we are still far above the permissible limits required by the OSHA regulation. These data have been posted as daily results and weekly averages in each of these buildings for the past nine months. This is being done since notification of employees is a requirement of the regulation. Any belief that anyone might have, that the Painesville plant employees do not know the level to which they are exposed, is therefore naive. We have also shared with the Union Negotiating Committee our plans for engineering compliance for the future. The chart listing the engineering controls possible is an

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example (this particular chart was provided to the OSHA inspector on May 7).

2. While we at present have no difficulty in selling our resin at current VCM content this will become increasingly difficult as other suppliers make the needed process improvements which we are not making. This is likely to be a lesser problem in the Plastisol types than in Suspension. Especially Suspension resins in bulk will represent a level of vinyl chloride in the customers operation which I doubt that many will want to accept as a responsibility. In fact, our Allied plant (Masland) is reporting problems with OSHA compliance when using Painesville bulk 22. In brief, I feel our resins will not be competitive because we have not taken the necessary steps to make them so. This cannot be accomplished by hoping that a miracle will occur but requires equipment installation in the neighborhood of a million dollars for accomplishment (items 10 and 11 on the Engineering Control sheet).

3. Even if the commitment of 3.9 million dollars for engineering controls is made this will only, by itself, precipitate the need for additional capital commitments for the future. These are detailed on the sheet labeled "capital expenses". As we have often discussed, it does not make sense to talk about replacing the wornout equipment in Area I. When the future controls likely to be placed on the transportation of VCM are considered, it seems far more reasonable to plan a new plant for Geismar than to put any additional money into the old plant at Painesville.

4. In order to make the best utilization of our personnel resources at Painesville we have chosen to move some of our better people to other locations. Certain of these have already been moved in anticipation of the date of 12/31/75 being certain. The Painesville plant staff has therefore taken onto itself the responsibility of operating effectively for the remainder of this year with certain of our better people removed from the organization. This quite obviously represents an exposure in the area of continuing high quality and high productivity from our operation with reduced staffing. If it was not the intent of the Company to discontinue Marvinol manufacture on December 31 then I have taken on responsibilities more than I should have in terms of best utilization of our better personnel.

5. I cannot, as I think over the implications, believe that serious consideration can be given to sending Bob Douglas to Master Negotiations in early February 1976 under either of these conditions:

- a. An announcement was made on September 30 that Marvinol production would be discontinued on December 31 and the plant organization is in the throes of all of the personnel problems represented by reducing wage and salary by one-half by the end of March. Or:

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- b. An announcement was made on December 31 that Marvinol production would be discontinued on March 31 and one-half the wage and salary staff would be eliminated by June 30.

Either of these represents an impossible condition for the Painesville plant, the Division Industrial Relations Department and the Corporate Industrial Relations Department. It seems far better to have taken our lumps and to be in a position of healing the wounds before Master Negotiations begin rather than to be involved in all the emotional turmoil which will be present during the personnel reductions.

In summary the longer we wait to take the necessary action the more problems we will have to suffer. Given the proposition that we must take the action, I cannot believe the consideration of the possible additional NIBT (which may in fact be highly unrealizable) can be sufficient reason to delay this decision. It did not serve my purpose as a member of the Marvinol SPD Board to argue this case last week any more strongly than I did. I feel much more strongly to have the decision made that I expressed last Friday. I would welcome the opportunity for further discussion with you, Mr. McNeill or anyone else to speed up the decision which I feel is now overdue.

UPL 14400


B. R. Leach

BRL:nak
Att:

URL 14401

RESIDUAL VCM IN MARVINOL
PPM VCM BY WEIGHT

TYPE	PRESENT OPERATION				ESTIMATED RESIDUAL VCM
	AS PACKAGED		AS REC'D. BY CUSTOMER	AFTER STRIPPING	
	AVE.	RANGE	BAGS	H/C	SYSTEM IMPLEMENTATION MAXIMUM
MARVINOL 10	152	15-940	7.0	-	< 5
" 19	751	85-2243	214	-	<10
" 22	511	39-910	13	424	<10
" 23	657	37-2920	60	615	<10
" 24	1407	133-2445	318	N.A.	< 25
" 53	23	3-133	6	-	<1.0
" 5008	6	4-8	N.A.	-	<1.0
" 5051	11	N.D.-34	4	-	<1.0

N.D. - Non-detectable

N.A. - Not available

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PAINESVILLE PERSONNEL REQUIRING RESPIRATORY PROTECTION

	NUMBER OF PERSONNEL REQUIRING RESPIRATORY PROTECTION <u>5/1/75</u>	AVERAGE % OF TIME REQUIRING RESPIRATORY PROTECTION <u>5-25 PPM VCM</u> <u>OVER 25 PPM</u> <u>(CANISTER)</u> <u>(AIR LINE SUPPLIED)</u>		<u>TOTAL*</u>
I. <u>PRESENT OPERATION</u>	290	25%	8%	33%
II. <u>AFTER IMPLEMENTATION OF PROPOSED IMPROVEMENTS</u>	213 (Change is Paracr11)	10%	2.0%	12%

*Time in a day that masks must be worn by those who must wear masks.
This total will be required after April 1, 1976.

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ENGINEERING CONTROL & WORK PRACTICES

			BLDG. 107	BLDG. 108	BLDG. 414	BLDG. 415	BLDG. 421 (OZC)
PRESENT AVE. VC (PPM)			15	7.0	30	5.0	5
EXPECTED VC LEVELS (PPM) AFTER CHANGES		CAPITAL COST \$					
ENGINEERING CHANGES							
1.	Solvent Cleaning & Recovery	560,000	8	7	20	5.0	5
2.	Venting Reactors Prior to Entry	157,000	6	7	16	5	5
3.	Recovery Seal Improvements	88,000	6	7	14	5	5
4.	Ventilation of Process Bldg.-107,117,414	848,000	3	7	9	5	5
5.	Control VCM Release at Unit Operations	74,000	3	5	7	5	5
6.	Delumper in Suspension Resin System	100,000	3	5	6	5	5
7.	5000 Gal. Reactor Flush System	44,000	3	5	5	5	5
8.	S.D. Process Bldg. Pressurized Room	20,000	3	5	5	5	5
9.	Breathable Air	510,000	3	5	5	5	5
10.	Suspension PVC Stripping & Product Decontamination	735,000	3	5	5	>1.0	5
11.	Plastisol PVC Stripping & Product Decontamination	525,000	3	1.5	5	>1.0	2
12.	HiBoiler Disposal-Pure VCM Distillation	7,000	3	1.5	5	>1.0	2
13.	Purge VCM Unloading Line	66,000	3	1.5	5	>1.0	2
14.	Paracril OZO Finishing Line Ventilation	80,000	3	1.5	5	>1.0	>1.5
15.	PVC Warehouse Ventilation	63,000	3	1.5	5	>1.0	>1.5
TOTAL		\$3,877,000	3	1.5	5.0	>1.0	>1.5
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DRYER EXHAUST VCM CONTENT, PPM

<u>EMISSION POINT</u>	<u>PRESENT OPERATION</u>		<u>ESTIMATED VCM AFTER STEAM STRIPPING IS IMPLEMENTED</u>
	<u>AVE.</u>	<u>RANGE</u>	
1. WILLIAMS MILL (M-10)	49	4-120	1.0
2. SOLIDAIRE DRYER (M-5800 TYPE)	17	3-100	-
3. SWENSON MAIN COLLECTOR	26	5- 70	3.3
4. BOWEN #1 " "	32	3-180	5.7
5. BOWEN #2 " "	45	3-150	4.4
6. S.D. MAIN COLLECTOR (SUSPENSION RESINS)	66	3-350	4.8

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ANTICIPATED EPA STANDARD ON VCM EMISSION
(EXPECTED COMPLIANCE DATE = JAN. 1978)

<u>AREAS & OPERATION</u>	<u>ANTICIPATED STANDARD</u>
1. MONOMER UNLOADING, STORAGE SAMPLING & TRANSFER	NO DISCHARGES DIRECTLY TO ATMOSPHERE. ALL LINES MUST BE VENTED & PURGED TO RCVM SYSTEM.
2. POLYMERIZATION AND STRIPPING AREAS	MUST MEET OSHA STANDARDS.
3. MONOMER RECOVERY VENT LOSSES	MAXIMUM ALLOWABLE DISCHARGE IS 10 PPM. USE OF ACTIVATED CARBON ABSORPTION UNIT IS FEASIBLE.
4. CONTROL VCM IN SLURRY	MAXIMUM RESIDUAL VCM CONTENT OF 400 PPM (DRY WEIGHT) FOR ALL TYPES. STEAM STRIPPING IS FEASIBLE.
5. CENTRIFUGE, DRYER, BAGGERS, AND STORAGE SILOS OR BINS	MAXIMUM DISCHARGE OF 10 PPM FROM EACH SOURCE. STEAM STRIPPING WILL RESOLVE THE PROBLEM.
6. WATER EFFLUENT	NO STANDARD AS LONG AS PVC SLURRY CONTAINS LESS THAN 400 PPM OF RESIDUAL VCM.

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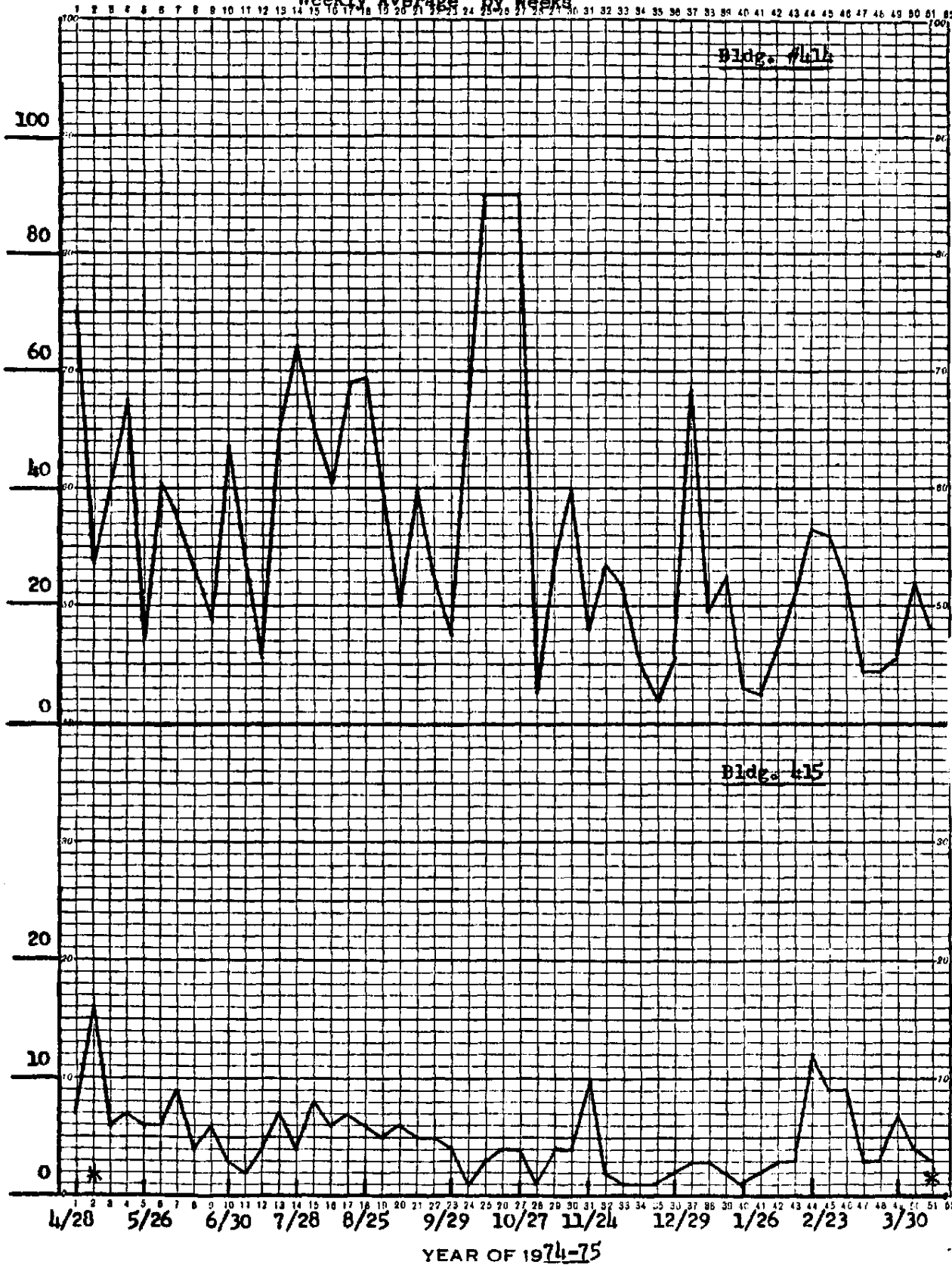
CAPITAL EXPENSES

	<u>CAPITAL \$M</u>	<u>EXPENSE \$/YR</u>
A. ENGINEERING CONTROLS	<u>\$3,877</u>	<u>\$ 2,410,000</u>
B. MONITORING	559	130,000
C. PERSONNEL PROTECTION	50	210,000
D. EPA COMPLIANCE	<u>75</u>	<u>40,000</u>
SUB TOTAL	\$4,561	\$ 2,790,000
E. FIA INSURANCE REQUIREMENTS	2,000	
F. CONVERT 2ND BOILER	1,200	
G. REPLACE AREA 1 POLY AREA	<u>15,000</u>	
GRAND TOTAL	\$22,761	

ALTERNATE: NEW PLASTISOL PLANT @ GEISMAR FOR \$35,000M

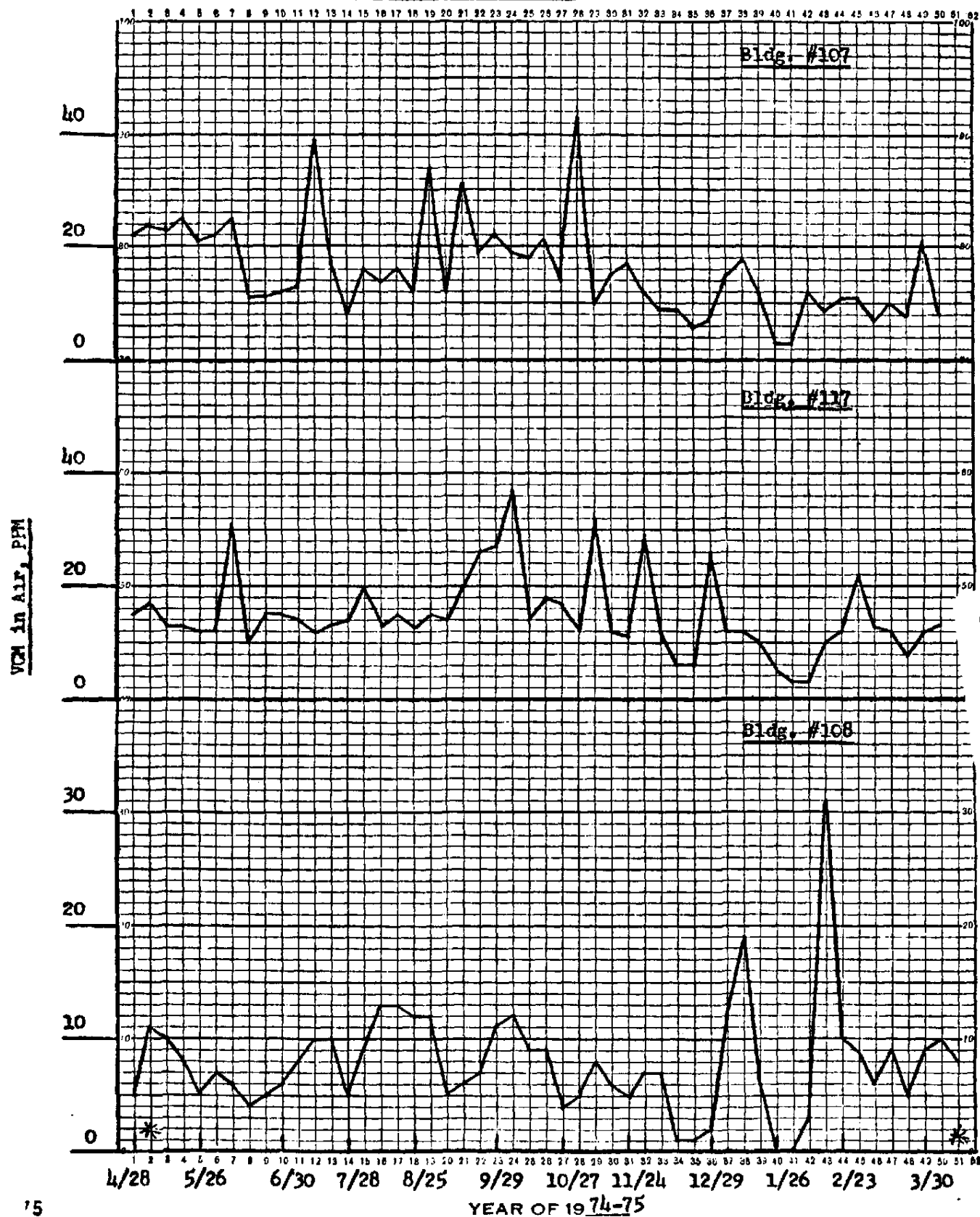
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Suspension Resin Plant -
VCM Concentration in Air
Weekly Average by Weeks



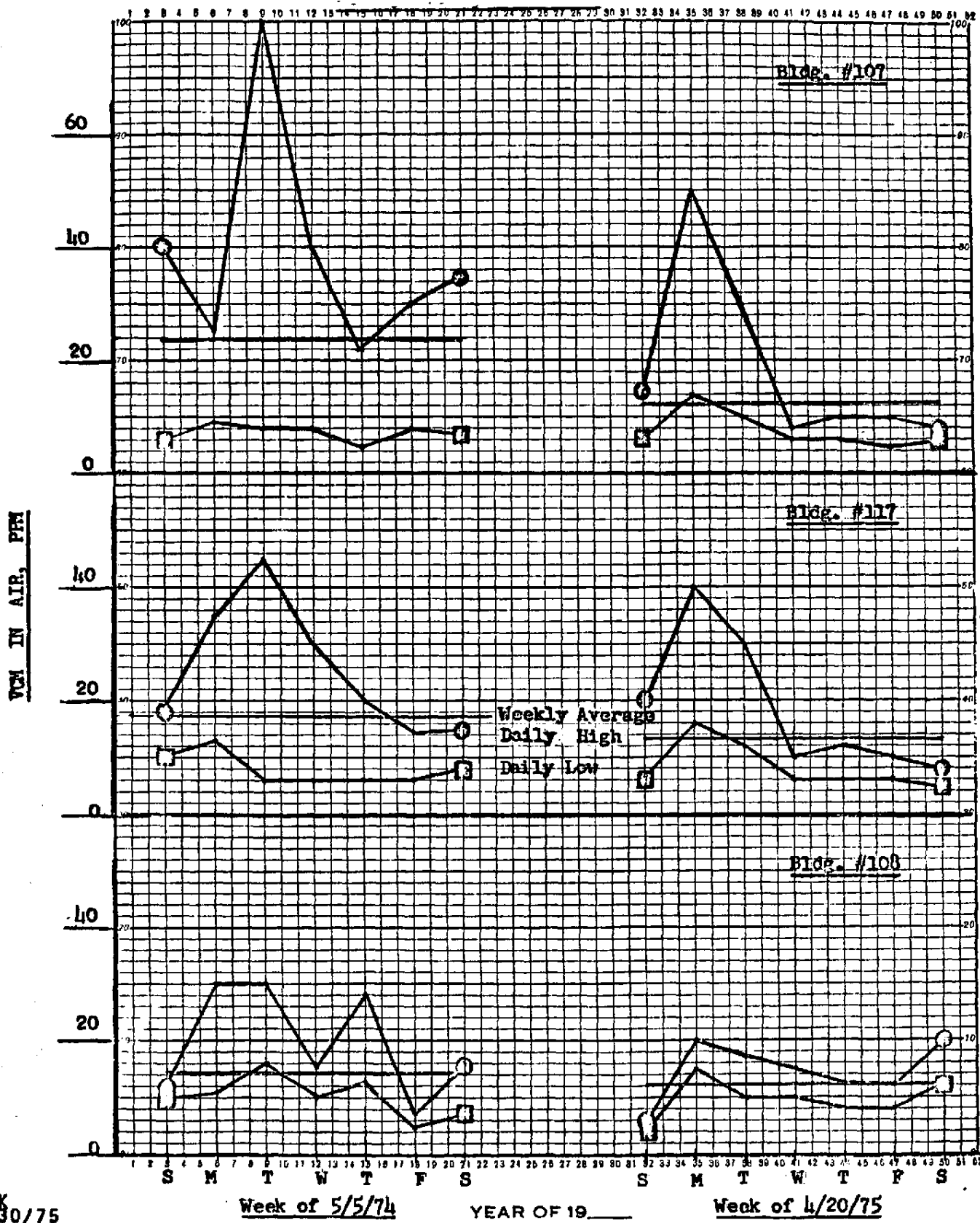
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Dispersion Resin Plant -
 VCM Concentration in Air
 Weekly Average by Weeks



JPL 14408

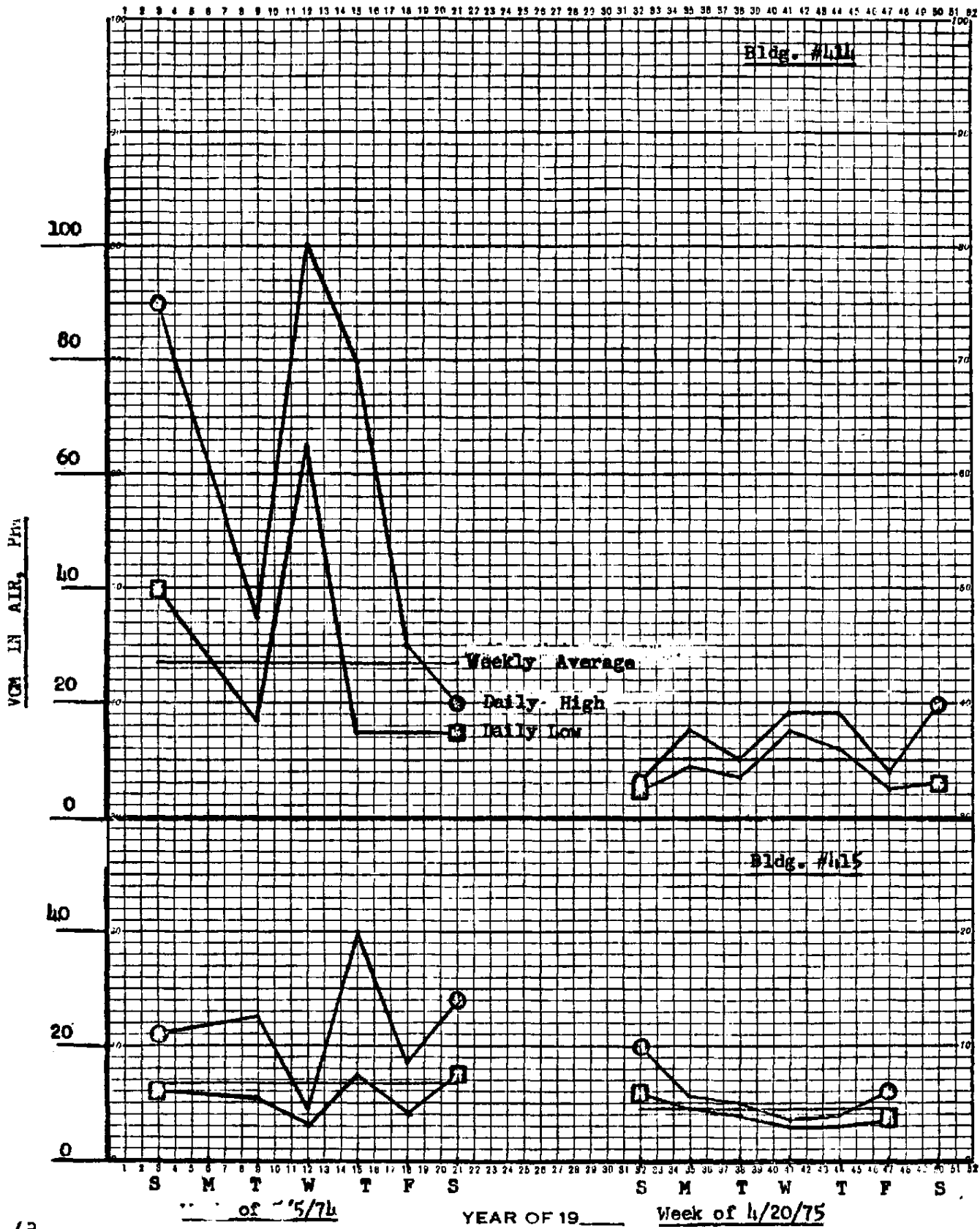
Dispersion Resin Plant -
VCM Concentration in Air



CHK
4/30/75

JPL 14409

Suspension Resin Plant -
VCM Concentration in Air



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