COPY SENT To C. Phillips

Ref-Mat-Carc.-VC
MTM R&D 01-VC/PVC-GO

MEMORANDUM OF VISIT

Visit to:
National Air Quality Criteria Advisory Committee (NAQCAC) Meeting

Date of Visit:
March 26, 1975

Shell Personnel Present:
J. E. Berger — MTM R&D Fuels

FMP 3

Vinyl chloride and lead were among the topics discussed at the regularly scheduled NAQCAC meeting March 21, 1975. The discussions of these two subjects are of interest to Shell and are summarized below:

Vinyl Chloride

EPA activity in regard to vinyl chloride was described by Mr. F. J. Burmann, an official from the monitoring section of the Research Triangle Park facility. According to Burmann, the EPA's concern about vinyl chloride became urgent in January of 1974 at which time a task force was formed. The task force surveyed the U.S. vinyl chloride monomer plants (15 in number), the vinyl chloride polymerization plants, and the PVC fabrication plants (7500 in number) in order to select a small number for detailed monitoring. Three facilities were finally chosen for scrutiny. The vinyl chloride monomer plant selected for monitoring is Shell's Norco facility; in addition, two polymerization plants were selected. One is Conoco's Mississippi PVC plant and it is an "open" plant in that the polymerization reactors are out-of-doors; the other is a "closed" B. F. Goodrich PVC plant in Louisville in which the polymerization is carried on indoors.

Burmann described the analytical procedure as an integrating method which yields 24-hour average values. Air is drawn through a tube filled with activated carbon; the carbon adsorbs vinyl chloride which is subsequently desorbed with carbon disulfide and subjected to quantitative analysis via a GLC column equipped with flame ionization detectors. The EPA has a high degree of confidence in the reliability of the method which is said to possess a detection limit of 1 ppb. To support the assertion of reliability, Burmann noted that EPA laboratories and Canadian labs agreed to within 2.4 percent despite the fact that different methods and different standard gas mixtures were employed by the two labs. Freon-12 has a retention time virtually identical to that of vinyl chloride, but this interference was characterized as being of no practical significance.

---

cc Head Office
- General Manager - MTM/Chemical R&D
- Environmental Affairs - Public Affairs - Manager✓
- Product Administration - Gasoline - Product Manager
- Legal - J. A. Evans

MTM R&D - Product Development
- Chicago
- Detroit
- San Francisco

Washington Office - Representative - J. C. Ellis

Dr. S. S. Epstein then moved that a resolution be sent to EPA Administrator Russell Train reiterating NAQCAC's concern over the lead issue, and again requesting that EPA issue a "Criteria Document" for lead. (It will be recalled that the publication of a criteria document initiates a mandatory sequence of steps leading irreversibly to an ambient air quality standard.) The motion carried 9-2.

It is my opinion, based on this meeting and others, that the lead issue will not disappear even if the full Court of Appeals upholds the December, 1974 three-judge decision in favor of Ethyl, et. al. I believe the EPA will experience continuing pressure to establish an ambient air quality standard for lead. I thought I detected, On March 21, a slight change in the EPA's previously adamant opposition to the concept.

Jerry Berger

JEB