



TEXAS CHEMICAL COUNCIL

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April 5, 1982

To: Air Conservation Committee Members

The Air Conservation Committee met at the Ramada Inn Hobby Airport, on March 17, 1982. Attached is the attendance roster. The following reports and specific items were presented and discussed:

General Discussion of 1981 Planned Activities - C. T. Seay

Chairman C. T. Seay briefly reviewed the recent past efforts of the Air Committee and pointed out many of the benefits resulting from the significant efforts of the committee members. He expressed Texas Chemical Council (TCC) appreciation for these past efforts of dedicated committee members, and pointed out his concern that this nucleus of support was too narrowly based which represents an overload to some members and a lost opportunity to learn and contribute by other members. Mr. Seay pointed out that our objective was to have all members assigned to one or more of the active subcommittees. He reminded all members that while we have heard a great deal about how the new administration would reduce the environmental regulatory burden within our industry, nothing at this time has significantly changed. We are still confronted with numerous and important environmental issues on both a national and state level.

Review of Subcommittee 1982 Planned Activities

- Control Technology Guidelines (CTG) Activities - Chairman Andy Nickolaus, DuPont, (512) 573-5111

The EPA develops and issues technical guidelines to the states which are to be used in the various State Implementation Plans (SIP) to control emissions from specific sources. Once these documents are issued by the EPA, little or no opportunity exists for industry to impact or influence the actual contents of these guidelines. The CTG subcommittee ensures that TCC has an opportunity to input data into the development of these critical documents before they become final.

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The additional responsibilities of the CTG Subcommittee are to:

1. Comment on proposed federal regulations.
 - CTG's which define Reasonably Available Control Technology (RACT) for existing sources and which must be incorporated into state implementation plans,
 - New Source Performance Standards (NSPS) for new and modified sources, and
 - National Emission Standards for Hazardous Air Pollutants (NESHAPS) for both new and existing sources.
2. Coordinate these comments with the Chemical Manufacturers Association (CMA).

Whenever possible, we comment at several stages in the regulatory development process starting with the contractor's draft Background Information Document (BID). This is followed by comments at the National Air Pollution Control Technique Advisory Committee (NAPCTAC) where the EPA first discusses their proposed regulation, and then at the public hearing after the regulation has been proposed in the Federal Register. Based on December 1981 information from the EPA Office of Air Quality Planning and Standards, regulations we would expect to comment on during 1982 are summarized in Table 1 (attached). Many of these dates seem to be slipping.

- Fugitive Emissions (CTG, NSPS and Benzene NESHAPS)

On January 15, 1982, comments on the revised CTG were sent to the EPA. These were essentially the same as our July, 1981 comments on the Synthetic Organic Chemical Manufacturing Industry (SOCMI) maintenance and screening studies. Our comments again emphasized the need to incorporate the SOCMI data into the EPA data base and control strategy. The EPA is supposed to be doing this and a revised document for the NSPS and benzene-NESHAPS, which was to be ready in February, 1982, is now scheduled for April, 1982.

Kittleman and Hess of DuPont have continued to work with the EPA on their mathematical model; ours and theirs are now on the same basis.

On January 21, 1982, Dan Martin, representing the CMA, and I, representing the TCC, discussed our comments on EPA's proposals with Richard Tropp and Spurge Baskin of the Texas Air Control Board (TACB). This meeting was at their request, and they were about to start writing fugitive monitoring regulations for the chemical industry in Harris County based on those for petroleum refineries. They have agreed to let us work with them on these.

- Volatile Organic Liquid (VOL) Storage (CTG, NSPS, Benzene NESHAPS)

Development of this still awaits the outcome of American Petroleum Institute (API) studies. We understand the API will differentiate between the emissions from vented internal floating roof tanks

common in the petroleum industry and the closed cone roof tanks fitted with internal floating roofs which many of us in the chemical industry now have.

- Air Oxidation Process (CTG, NSPS)
Polymer Resin Manufacture (CTG, NSPS)
Distillation Operations (NSPS)

No activity since December 3, but we are expecting a draft of the BID on distillation operations to become available at any time.

- Flare/Incineration - Chairman, Larry Thurston, Dow Chemical (713) 238-9640

The EPA has taken an arbitrary and unsupported position that the destruction efficiency of flares is only about 60 percent and are, therefore, an unacceptable control device. The chemical industry has large investments in flares as control devices and has taken strong exception with EPA position concerning flaring efficiency. Numerous test programs are being planned and conducted to establish actual flare efficiencies. TCC, which has most of the field technical data in this area, is participating in an expert advisory role and this subcommittee is responsible for this activity.

This committee will address these issues and the chemical industry concerns in four ways during 1982:

1. Pull together a data base for flares and incinerators for all TCC companies.
2. Participate in CMA flare study with technical advice and peer review.
3. Participate in EPA/EER flare study through technical comments and peer review.
4. Input good science and data into the regulatory process through testimony and comment. This effort may be either independent or jointly with CMA.

- Noncriteria (Toxic) Emissions - Chairwoman, K. Shewbart - Dow Chemical (713) 238-2414

There is growing public interest in this subject, and TACB has made it very clear that it will likely be the state's biggest issue in the 1982+ time frame. There is already an agreed upon pilot program covering approximately 7-10 compounds initially to be conducted in Harris and possibly surrounding counties. This subcommittee will manage the TACB interface relating to this program and other related evolving issues. We remain opposed to burdensome, unnecessary reporting requirements and use of complicated modeling techniques where well planned, limited scope, air monitoring programs will suffice.

Because of the criticism that the Air Control Board is not doing enough concerning the control of toxics, the TACB adopted Resolution

R82-5 at its February 12, 1982 board meeting concerning the control of toxic emissions. A copy of that resolution is attached. It is believed that the resolution is generally consistent with the effort of the TACB as initiated by the TCC to evaluate the emissions of ten noncriteria pollutants. A copy of Bill Stewart's letter of February 9, 1982, to the Medical Resource Advisory Panel asking for their assistance in identifying compounds to be studied is attached. It is noted that the TACB staff has suggested that the study exclude not only the criteria pollutants but also hazardous pollutants for which standards have been established under Section 112 of the Federal Clean Air Act and pollutants for which the Air Control Board has established net ground level concentration standards.

The Air Control Board staff has indicated that the Deer Park rash study initiated last fall will probably be released in early April. The draft of the report by the staff will be sent next week to the Medical Resources Advisory Panel and other peer review experts. It appears from discussions with the TACB staff that they have not found any cause for the rashes in the Deer Park area. However, a medical review panel is being organized to look at the medical evidence to determine if any environmental causes can be ascertained.

- Bubble Policy - Existing Sources - Chairman, W. Beck - E. I. DuPont (713) 886-6239

Based on the concepts set forth in the EPA's bubble policy of December 11, 1979, the TACB adopted on February 13, 1981, Rule 101.23 entitled "Alternate Emission Reduction ("Bubble") Policy." This rule applies to the bubbling of only existing sources and only to control requirements adopted on or after March 30, 1979.

In Texas an applicant must have his bubble application approved by the EPA as an SIP revision. In view of EPA's approval of the generic bubble concept for VOC sources in New Jersey, we believe an effort should be made to obtain adoption of a similar generic bubble rule in Texas to avoid the SIP revision process for each application. The TACB will probably not adopt a generic rule unless some industry group petitions the board to adopt such a rule. This subcommittee is charged with developing TCC position on the Bubble Policy and implementing actions necessary to accomplish our objectives.

- Banking/Offsets - Chairman, L. Stewart - Petro-Tex (713) 475-7750

The TACB does not have any formalized banking rules, but has informally allowed the use of banked emission reductions if the reductions actually occurred after the implementation of the offset policy on December 21, 1976. A special additional problem exists in Harris County. Because of the lack of sufficient hydrocarbon emission reductions to demonstrate attainment of the ozone standard by 1987, it is likely that all banked hydrocarbon emission reductions will be lost upon the adoption of the 1982 SIP. (According to EPA, the SIP must be based on actual rather than allowable emissions.) From discussions with Bill Stewart (TACB), it appears that company

can use banked emission reductions up until the time the board approves the 1982 SIP, which is not expected to occur before September 1982. It is possible that these banked emission reductions can continue beyond that time but, so far, we have not received any assurances to this effect from either the TACB or EPA. The responsibility of this subcommittee is to ensure that as much of the banked offsets are retained by companies as possible.

- Regulation V Changes For Harris County - Chairman, J. Cox - Exxon Chemical (713) 428-3601

The TACB must apply additional controls to sources within Harris County to ensure air quality attainment by 1987. They have completed a study by Radian to provide TACB with the technical information on the effectiveness and cost of controls which could be applied to stationary sources of VOC in Harris County. Since the 1979 SIP revisions were directed most at petroleum refineries, the 1982 SIP revisions will be directed at the chemical industry. This subcommittee will ensure TCC develops and presents technical data at all public hearings, to TACB staff, etc., in an attempt to obtain the best possible Regulation V changes.

A public meeting to discuss proposed control strategies for the 1982 SIP for Harris County has been scheduled for April 27, 1982, in Houston, at the City Health Department auditorium. It was pointed out that the controls applied to Harris County would probably be applied to other areas which did not show attainment by the end of 1982. This could represent a large portion of the Gulf Coast area and is a prime concern of TCC.

- Special Assignments - C. T. Seay

It has become increasingly apparent that numerous activities which are not large enough to justify full committee-type actions are important enough to receive special attention by members of the committee. Should the issues involved in these various activities become of significant interest or of great importance, a subcommittee could and would be established. The following areas have special assignments status. It is the responsibility of the assigned member to keep the entire Air Committee informed of the activities in his area of interest.

- 1) I/M Requirements 1982 - L. Feldcamp (Baker/Botts - (713) 229-1573)
- 2) Major Modification Definition - L. Feldcamp (Baker/Botts - (713) 229-1575)
- 3) CMA/TCC Interface - T. Rhodes (Exxon Chemical - (713) 870-6117)
- 4) TOMGA/TCC Interface - C. Rivers (Shell - (713) 476-7667)
- 5) TACB Contract Activity - K. Ripley (Dow - (713) 238-2195)
- 6) Environmental Health Interface - C. Fetzek (Marathon - (713) 945-2331)

- 7) Public Affairs Interface - No appointment made
- 8) Solid Waste Activities Interface - R. Olafson (Lubrizol - (713) 479-2851)
- 9) Ship/Barge Emissions - D. Martin (Union Carbide - (512) 552-9711)

Three reports were made by the Special Assignment members:

- Ship and Barge Emissions - Dan Martin (by J. B. Cox)

Activity to regulate ship and barge vapor controls began to gather speed in 1978 as regulating agencies began looking at secondary emission sources. The SIP requirements of the 1977 Clean Air Act challenges construction permits because secondary emissions and land use were not considered in sufficient detail. Both California and Texas had already issued permits to control ship and barge vapors in special cases and as a result of demonstration of technology, the agencies moved to incorporate all such emissions with existing rules and permitting activity without public hearing and without adequate review by other governmental agencies.

These comments do not include pressure tank barges or ships since such vapor controls were already in place with acceptable technology and cost effectiveness. The concern here is "open" ship and barges. The several permits issued by this time were for specific compounds to control odor or personnel exposure. These were very high cost operations in which the systems were overwhelmed with air for safety reasons and then excess fuel to destroy the compounds in incinerators or flares. None of these systems to date had Coast Guard approval.

As the TACB moved to regulate these emissions as special provisions to permits, the TCC and others challenged this rule making without hearing and proven cost effective and safe controls. Other organizations entered the challenge such as API, WOGA, AIMS, IWO, IMCO, and the Coast Guard. EPA reluctantly joined in.

With the promise of test work and development of technology with Coast Guard approval, the TACB backed off controlling ship and barge controls. The Coast Guard then took the lead and held a hearing in Washington, D.C., in December, 1978, at which time all affected parties met and discussed the problem. Several activities were proposed:

Update Bureau of Mine data on safe handling of vapors and flashback controls.

Demonstrate ship controls such as the Exxon project in California.

Several studies such as Pullman Kellog, Exxon, Hondo, etc.

Demonstrate gasoline barge controls.

The latter project was sponsored by EPA, USCG, and API, and was planned to take three to five years. With this project and the other activity, most agencies were persuaded to back off on ship and barge controls. It was generally felt by chemical industry people that this technology, once developed and approved, would then be applied to the chemical barges and that the necessary regulations would be put in place.

There is considerable undocumented work going on by many barge companies, chemical companies, and shipping companies to accomplish various goals. For example, the handlers of benzene are modifying their equipment to reduce personnel exposure. A summary of these projects would probably illustrate acceptable and safe technology.

The next round of SIPs will probably renew agency attempts to control secondary emissions. As the EPA demonstration project winds up this spring (1982) and if Coast Guard approved, we can expect renewed regulatory activity. IERL of EPA should finish this work this year.

CMA, TCC, API, and others should consider formulating committees or joint activities to stay abreast of and involved in regulations development by EPA and the several states that are leaders in such rule making. We are in the fourth year of the five-year projection to develop controls.

- TACB Contract Activity - K. Ripley (presented by J. B. Cox)

A list of the TACB's pending studies is attached. At a recent meeting with Bill Stewart, Roger Wallis, and others of the TACB staff, it was indicated that industry advisory committees of three to five members would be welcome on several of the studies. These include the evaluation and testing of the TACB bubbler method for measuring SO₂, assessment of the significance of emissions of inhalable particulate matter in the Houston-Galveston and El Paso areas, an examination of odor problems associated with petrochemical and petroleum facilities, and analysis of the 1981 Harris County summer study data. Some further information on these studies are as follows:

- + The inhalable particulate matter study will be looking at particles of 15 microns or less unless the EPA adopts, prior to the initiation of the study, an inhalable particulate standard having a different size limit. These studies will be a continuation of earlier aerosol studies. The TACB will be looking at various sources of inhalable particulates with the objective of developing strategies for controlling inhalable particulates from these source categories.
- + With respect to the odor study, ten sources in the Beaumont-Port Arthur area and ten sources in the Houston-Galveston area will be identified for the purposes of this

study. Past history of odor problems will be the primary basis for identifying these 20 sources. Because portions of this study have the potential for enforcement action against these sources, it was indicated to the TACB that industry did not want to have an advisory committee with respect to such activities. However, with respect to those portions of the study relating to the development of generic regulations which would be included in Regulation V, it was indicated that we would want to have an industry advisory committee.

- + With respect to the Harris County data, it was indicated that the study primarily involves a correlation and compilation of the data that had been collected during the summer of 1981. The TACB staff is primarily looking for some computer expertise as this study does not involve an evaluation of the data and an attempt to draw conclusions from that evaluation.

For the research needs contract, the TACB intends to appoint a five-member scientist advisory committee which in effect would be similar to the federal Science Advisory Board (SAB). Most of the members of this group will be from state universities. It was indicated that the Air Control Board would be receptive to having one industrial representative on the group, which will probably be Bill Beck of DuPont. Also acting as advisors will be Dr. Kilian and members of the TACB Medical Resources Advisory Panel. It appears that this project will involve two contracts, one to define "federal research objectives" and the second to define "Texas research needs," with the contractor on the latter study to take the input from the first on the federal research objectives to develop specific research proposals. The primary function of the Texas SAB will be to identify people to be interviewed across the county and to develop the interview protocol/questions. The actual interviews will be carried out by the contractors.

- Environmental Health - C. Fetzek

The Environmental Health Committee met on March 10, 1982. The meeting was opened by Mr. E. D. Eike introducing Dr. Pat Buffler, M.D., who is Dean of Research at the University of Texas Health Science Center.

Dr. Buffler presented information on a health effects (epidemiology) study her department conducted to determine what relation there was between air pollution and lung cancer in the Gulf Coast area of Texas. The study was separated into two parts: acute effects and chronic effects from exposures to air pollutants. She described when and why the initial concern was raised showing the relation between lung cancer and other cancers in the area; the method used for selecting study groups; equipment and procedures used to study the groups and the ambient air quality they were determined to be exposed to; and

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methods being used to correlate and analyze the data obtained. Results from the portion of the study covering acute effects is expected to be released in final form July, 1982. The chronic effect study results are anticipated to be released in late-1982. It is believed that Dr. Buffler's presentation would be as interesting, if not more interesting, to the TCC Air Conservation Committee.

Mr. H. Kirsh of Texaco Chemical Company gave an update on status of ethylene oxide regulations. OSHA currently has a standard of 50 ppm TWA for ethylene oxide. Based on information released by Union Carbide indicating a relation between repeated exposures to ethylene oxide concentrations above 100 ppm and certain types of tumors, pressure has been placed on OSHA by a concerned citizens group to reduce the standard to 1 ppm TWA. The American Council of Governmental Industrial Hygienists has a current recommended Threshold Limit Value (TVL) of 10 ppm TWA and is planning to reduce it to 5 ppm. Apparently a standard of 1 ppm would have a profound effect on the health care operations (hospitals, etc.) because of wide application of ethylene oxide for sterilizing equipment, especially surgical equipment, to avoid patient contamination and subsequent complications. OSHA, NIOSH, CMA, some individual manufacturers, medical professionals, and a group representing concerned citizens are all involved in trying to develop new regulation on ethylene oxide. Another update is planned for our next meeting.

• New Business - C. T. Seay

Ms. Anne Gorsuch, EPA Administrator, visited the Houston area on March 15, 1982. During lunch, industry had the opportunity to visit with Ms. Gorsuch and discuss some of the concerns and issues of the Houston area. Our Mr. Chuck Rivers made the presentation and the information was favorably received. Attached is a copy of the hand-out used during this presentation.

There being no further new business, the meeting was adjourned. These minutes are respectfully submitted by J. B. Cox.

JBC:vta (0183P)

Attachments

YZ0028901

TEXAS CHEMICAL COUNCIL
Air Conservation Committee Meeting
March 17, 1981

Name	Company	Location	Phone
G. B. Cox	Exxon Chemical	Baytown	428-3601
CT. Seay	" "	"	428-3883
Larry Bone	Dow	Freeport	235-3215
Karen Stewart	"	"	713-238-2414
Say E. Fearing	Georgia Gulf	Baytown	713-479-4453
Larry Thurston	Dow	Freeport	713-238-9640
Ted Nairn	Cosden Oil & Chemical	Big Spring	915/263-7661
✓ Paula J. Case	Ethyl Corporation	Pasadena	(713) 475-6157
John Haladyna	Du Pont	Beaumont	(713) 727-9528
✓ Wm B. Beck	Du Pont	ORANGE	(713) 886-6239
A. Nidalam	Du Pont	Victoria	(512) 573-5111
J. M. Otto	PPG IND	BEAUMONT	713 838 4521
R. T. ROGERS	PPG IND	BEAUMONT	713 838 4521
Malcom Payne	DUPONT	L2 Porte	713 470-3276
BOB MAURER	CELANESE CHEMICAL	PALLAS	214-689-4069
Mike Mullin	ARCO Chemical Co	Channelview	713-457-4650
J. F. ERDMANN	UNION CARBIDE CORP.	TEXAS CITY	713-948-5126
LLOYD STEWART	PETRO-TEX CHEM.	HOUSTON	475-7750
JOHN K. PERRIN	DIXIE CHEMICAL CO.	PASADENA	479-3271 or 479-2521
JOHN ROESER	GAF Corp	Texas City	713-945-3411
T. H. JACOB	MOBAY	BOXTOWN	713-383-2411
Brenda A. Ruckstrom	Mobay	Baytown	713-383-2411
Carl Vincent	Gulf Oil Chem. Co.	Orange	713-886-7491
Al Wohlfort	U.S. Industrial Chem. Co.	Deer Park	713-479-2873
WALTER J. KRAUSHAAR	FIRESTONE	ORANGE	713-886-3601
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JOSEPH E. LEE	VINSON & ELKINS	HOUSTON	713-651-3812
TED WARRIN	MARATHON OIL	TEXAS CITY	713-945-2331
ROGER TOWE	PETRO-TEX	HOUSTON	713-475-7746
Valeri Kenner	Phillips Chemical	Pasadena	(713) 475-3807
Chuck Fetzek	Marathon Oil	Texas City	(713) 945-2331

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Andy Thompson	FMC	BAYPORT	713 474 4711
HAZEL R. HOFFMAN	ATLANTIC RICHFIELD Co.	HOUSTON	713/654-4632
C. L. ROY	MERICHEM	HOUSTON	713/455-1311
R. A. Bate	MERICHEM	HOUSTON	713-455-1311
L. W. Brandt	ARCO Chem. Co.	Pasadena	713-474-4191
E. H. Sweet	Reynolds Metals Co.	Corpus Christi	512-643-6531
P. A. WILES	PENNWALT CORP.	HOUSTON	713-455-1211
W. E. JACOBS	ARCO Chemical Co.	Port Arthur	713-724-3680
Herman L. Davis	Arco Chemical Co.	Houston	713 960-1222, ext 26
W. F. Muller, Jr.	Goodyear	HOUSTON	713-475-5406
C. U. Graham	Shell Chemical	Deer Park	713-476-7735
T. E. BOCKSTAEHLER	ROHM & HAAS BAYPORT	BAYPORT	713-474-4495
E. L. Gundersen	Gulf Chemicals Co. Baytown	Baytown	713-420-9139
JAMES W. KACHTICK	TENNECO CHEMICALS, INC.	PASADENA	713/479-3411
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Ken Ripley	Dow Chem	Freeport	713-238-2195
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