

DATE : May 4, 1981
SUBJECT : Monthly Report
April 1981
REFERENCE :
TO : M. Dmytryszyn - G4WA

CC. C. P. Farley - G4WA
M. R. Foresman - G4WA
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HIGHLIGHTS

Disposal Well Permit Applications - Texas City

To date there has been no request for public hearings on the permit application for the spare Texas City disposal well or the amendment to the existing well (WDW-90) permit. Comment period closes on May 4. If there are no requests for a public hearing the permit applications should go before the Texas Water Commission on the May 11 agenda in Austin.

It appears that EPA Region VI will give a positive reading on interim status for the spare disposal well if it was listed on the initial RCRA Part "A" permit application. We did list the well on the Part "A" application.

Disposal Well Legislation - Texas

The numerous pieces (4) of disposal well legislation introduced into this session of the Texas legislature are quietly dying in various House committees. The resolution for a 2 year study on disposal wells has been tabled.

NIOSH - Dioxin Study

NIOSH (P. A. Honchar, Ph.D.) submitted a request in March to Dr. W. Gaffey for access to personnel and medical records of W. G. Krummrich, J. F. Queeny and Nitro workers who may have been exposed to dioxin isomer contaminated materials, such as: 2,4,5-T acids and esters; 2,4,5 tri-chlorophenol; or pentachlorophenol. Honchar will visit the general offices May 4 for a definitive discussion and basis for agreement to meet NIOSH's need.

SUMMARIES

1. Objective

Coordinate and provide input to MCI programs to ensure compliance with corporate and regulatory OSHA/EPA guidelines and regulations.

Status

RCRA Chlor-Alkali Brine Mud Delisting

On April 23, 1981 the meeting was held between a Chlorine Institute

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1. (Continued)

Hazardous Waste Task Group and representatives of the Federal EPA Hazardous and Industrial Waste Division to discuss the RCRA listing of Chlor-Alkali Brine Muds. EPA stated that over one hundred waste delisting applications had been approved to date and that if sufficient data could be developed by industry to show that a waste was not hazardous, then a delisting petition would be approved. Matt Straus, EPA RCRA program manager, stated that EPA used ten times the drinking water standard for a hazardous constituent in the waste leachate as a cut-off point for a positive determination of non-hazardous. In the case of mercury, 10 times the drinking water standard would be 20 ppb. Mr. Straus went on to say that individual delisting petitions has been approved on a case-by-case basis at 20 to 30 times the drinking water standard if adequate disposal of the waste had been documented.

The outcome of the meeting was a tentative agreement for delisting of the Chlor-Alkali Brine Mud waste based upon compliance with a treatment performance standard developed in the form of a stipulation between the Chlorine Institute and EPA. A draft of the stipulation will be developed for submittal to EPA by 6/1/81.

2. Objective

Implement product acceptability guidelines covering the development of Monsanto Product Acceptability Resource people (PAR) and revised material safety data sheets for all MCI products.

Status

A PAR Dossier progress meeting was held with Petro-Chemical PT on April 9. Progress on completion of PAR Dossier's for Petro-Chemical products has been slow due to other commitments. Only two product assessments have been completed to date (AN and Styrene Monomer) with the remaining five 1980 committed products now targeted for 4th Qtr. 1981 completion. With seven product assessments complete by 4th Qtr. 1981, thirty-six (36) product assessments will need to be completed by Petro-Chem PT during the two year period December 1981-December 1983.

A material safety data sheet was drafted for 5 sulfosalicylic acid (SSA) and forwarded to DMEH for development of the physiological effects summary.

3. Objective

Assure that MCI products continue to be acceptable in terms of user safety and environmental impact.

Status

The product acceptability function is taking a leading role in developing a storage and handling bulletin for acrylonitrile. Process technology and manufacturing has supplied needed input to finish off a draft that is approaching "final". This document has been in preparation since 1978.

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3. (Continued)

DMEH has made the decision to use unofficial OSHA guidelines to determine when and when not to disclose the presence of carcinogens in products. The presence will be disclosed if the product contains greater than 1% of an animal carcinogen or 0.1% of a human carcinogen. This decision clears the way for new labels and literature on PC-1244 and PC-1344. These products may have the first Material Safety Data Sheets published on the new Monsanto form in MCI.

In cooperation with corporate E&MM, we are investigating the need and feasibility of adding the sale of contaminated scrap metal to Guideline No. 9 covering the evaluation of outside processors. So far we have worked with people at the Queeny, WCK and Chocolate Bayou plants.

4. Objective

Influence and manage programs within MCI to ensure compliance with regulatory and corporate environmental guidelines.

Status

Avon - Sulfur Plant Air Violations - Appears help may be in sight. TOSCO has agreed with Monsanto to construct foul water gas clean up unit on the Monsanto site which Monsanto will operate. TOSCO and Monsanto are to appear at the BAAQMD (Bay Area Air Quality Management District) office for an "office conference" on the subject and related permits for the project. (The project is key to TOSCO's \$89M refinery expansion).

J. F. Queeny - PCB Disposal - Rollins Environmental, Deer Park, Texas, has agreed to dispose of approximately 16,000 gallons of PCB contaminated liquid. Agreement was reached based on our existing 1978 contract with Rollins. This is the first shipment of PCB materials for disposal at the Rollins site since official EPA approval for incineration of PCB's was granted to Rollins in early March.

Avon - NPDES Permit - The plant received a letter on March 13 from the California Regional Water Quality Board stating the site must file for an NPDES permit by April 10, 1981. The plant has never had an NPDES permit. All liquid wastes are discharged to the adjoining TOSCO refinery which is renewing its permit. The letter is factually incorrect and addresses issues currently under litigation by CMA on the NPDES permit regulations. Environmental Law and MCI Environmental Operations are working with the plant in responding to the request.

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4. (Continued)

Disposal Well Permit Applications - Texas City - To date there has been no request for public hearings on the permit application for the spare Texas City disposal well or the amendment to the existing well (WDW-90) permit. Comment period closes on May 4. If there are no requests for a public hearing the permit applications should go before the Texas Water Commission on the May 11 agenda in Austin.

It appears that EPA Region VI will give a positive reading on interim status for the spare disposal well if it was listed on the initial RCRA Part "A" permit application. We did list the well on the Part "A" application.

Industrial Cost Exclusion (ICE) - Met with Jim Webb, Staff Assistant to Representative Robert Young, on the subject. (EPS, J. F. Queeny and MCI were represented). House Public Works Water Resources Subcommittee plans hearings on April 28 and 29 to discuss HB 2957, a repeal of the Clean Water Act's Industrial Cost Exclusion enacted in the last days of the 96th Congress. ICE bars the federal funding of sewage treatment grants after November 1 for construction of any treatment capacity used to clean up industrial water pollution. This essentially would eliminate any economical benefits of any industrial plant discharging into a POTW (Publicly Owned Treatment Works).

5. Objective

Reduce dependency on deep well injection of wastes; with emphasis on developing alternate disposal technology for remaining processes.

Status

TRC Review - Although we thought that we (MCI) were well prepared for the April 16 meeting, the tone of the meeting changed to stress waste stream reductions rather than the quality and completeness of the technology package. Additional emphasis will be given to waste stream reductions.

Disposal Well Legislation - Texas - The numerous pieces (4) of disposal well legislation introduced into this session of the Texas legislature are quietly dying in various House committees. The resolution for a 2 year study on disposal wells has been tabled.

6. Objective

Coordinate with other producers to provide appropriate testing of mono and dichlorobenzenes and obtain reasonable regulations for testing chlorobenzenes as EPA implements Section 4 of TSCA.

Status

CMA Chlorobenzene Panel of 5 participants is sponsoring teratology testing of mono and di (ortho and para) chlorobenzenes with Dow as the contractor. The mono teratology study interim report shows no compound related effects

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Phone 398-1234

Dear Mr. Smith:
I am writing to you regarding the matter of the

contract which was entered into between our
company and yours. I am sorry that the
terms of the contract are not as favorable
as you would like.

I am sure that you will understand the
position of our company in this matter.
I am sure that you will agree that the
terms of the contract are reasonable.

Very truly yours,
John Doe

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6. (Continued)

in rats, but a lack of comparable assurance in rabbits. The repeat rabbit study was started late March; preliminary results should be available early May. Pilot testing of ODCB is complete.

The SOCMA Chlorobenzene Producers Association (CPA) met with EPA TSCA Section 4 personnel March 6 to discuss voluntary versus mandatory testing. EPA provided only vague inputs of a basis for negotiation but did agree to respond to the CPA comments at an April meeting. Subsequently they reported other priorities would delay this proposed meeting to May.

7. Objective

To determine if employees exposed to chlorophenols exhibit any signs of adverse health or dermal effects in comparison to those not so exposed.

Status

A team under the direction of Dr. Suskind made a thorough study, starting October 1979, to identify any chloracne or other biological indicators among penta and chlorophenol exposed workers at the W. G. Krummrich plant. A preliminary report of the study, 9/80, confirmed chloracne from penta exposure but was not definitive for exposure to the lower chlorophenols. Efforts of DMEH to extract a final report from Dr. Suskind continue.

NIOSH (P.A. Honchar, Ph.D.) submitted a request in March to Dr. W. Gaffey for access to personnel and medical records of W. G. Krummrich, J. F. Queeny and Nitro workers who may have been exposed to dioxin isomer contaminated materials, such as: 2,4,5-T acids and esters; 2,4,5 tri-chlorophenol; or pentachlorophenol. Honchar will visit the general offices May 4 for a definitive discussion and basis for agreement to meet NIOSH's need.

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