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To: R. A. Conrad

From: G. E. Hopkins
Date: June 2, 1986

Interoffice
Communication

Subject: Vista Environmental Meeting - 1986

VISTA

On May 14 and 15, the annual Vista Environmental Meeting was conducted. Bill Swan, Virgil Fisher, and I attended from the LCVCM Plant. The following items of significance to the LCVCM Plant were discussed.

1) Landfill Ban

The EPA is evaluating banning the landfilling of several materials, as required by the RCRA amendments of 1984. It is possible that material with pH <2 or containing >1,000 ppm halogenated organics (such as EDC or Heavy Ends contaminated soil) could be banned from landfilling as early as November 1986.

2) EPA Toxicity

The EPA will be proposing a new measurement procedure for evaluating materials for EP Toxicity as well as adding 49 organics to the EP Toxic hazardous materials list and lowering the concentration criteria from 25 ppm to possibly as low as 1 ppm. It is not certain what these added organics will consist of but it is believed that EDC and other chlorinated organics at the VCM Plant are likely to be included.

These regulations could mean that any waste material (liquid or solid) containing 1 ppm or more EDC would be considered as EP Toxic hazardous waste. One major impact of this could be that wastewater will be classified as hazardous waste and the secondary, steam stripper, etc. would be required to be permitted as hazardous waste treatment facilities (double liners on basins, etc.).

The present expected timing is that EPA may propose the regulations this month and then finalize them in November. Amount of time allowed to comply after the regulations are finalized is

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uncertain but it is possible immediate compliance may be required. We might have to obtain an Administrative Order in that case until required revisions could be implemented.

With regard to the new measurement procedure, Rick Martin (R&D) will evaluate it. It involves a zero headspace analyzer. It is possible that assistance using our GC/MS may be required.

3) TSCA Overview

The main item stressed is that if we develop any new products we may be required to file a pre-manufacturer's notice (PMN) unless that material is already on the PMN list. When and if a new chemical or product is developed, we should immediately contact Tom Grumbles. It was pointed out that a number of industries have recently been fined severely (such as Diamond Shamrock, DuPont, Ciba-Geigy) for \$1MM and greater for failure to file PMN's.

It was also pointed out that if a health effect from exposure to a given chemical is observed that has not been previously documented by TSCA, we need to notify Tom Grumbles. We are allowed only 15 days after finding out to file with TSCA.

A TSCA update is expected to be required this year.

Every chemical we purchase needs to have a CAS number. This includes catalysts such as Kanegafuchi catalyst, BASF catalyst, etc.

4) Used Oil Regulations/Burning & Blending Regulations

EPA presently is planning to list used lube oils and hydraulic fluids as hazardous waste. This should not apply to slop oil. However, in conjunction with the burning and blending regulations if any used lube oil is added into a slop oil stream, the entire stream would be classified as hazardous and have to be handled accordingly (possibly incinerated at a hazardous waste incinerator). This will likely mean we will have to collect used lube oil separately into drums, and then store it in our hazardous waste storage area until it can be incinerated (or possibly combine the material with LCCP and LCLAB used oil for reclamation).

5) RCRA Training

Joe Ledvina and Tom Grumbles will evaluate various outside prepared video tapes for general overview training; and each plant will prepare training for site specific items.

6) Tank Bottoms Program

Other plants experiences were summarized as follows:

- ABD - 28 tanks built on the ground. 10 inspected so far. All were in good shape; not cathodically protected.
(Note: the ground in northern Mississippi is not very conducive to soilside corrosion according to a cathodic protection inspection contractor.
- OKC - 2 underground storage tanks. One of these, the chem. wash tank, was inspected and determined to be severely corroded. The tank was 8-9 years old and cathodically protected but the anodes were essentially gone.
- LCCP - All butanol tanks and the ethanol tank have been inspected and are okay.
- BALT - Incur about 3 tank bottom leaks per year. Installing shallow monitor wells near the tanks to check for leaks. Plan to install double bottoms on sprung oil tanks and recycle paraffin tank.

Related to this subject, EPA has done a statistical analysis of tank failures and concluded cathodic protection is not very successful as a preventative measure. This is believed due to improper installation and inspection but should be looked at closely when we evaluate cathodic protection for the VCM Plant.

7) OCPSE Influent/Effluent Guidelines

Timing on finalizing the guidelines may slip some past November 1986. The influent portion of the guidelines may not be included in these regulations, however, future air regulations, EDC NESHAP regulations, and/or EP Toxicity regulations may eventually result in essentially equivalent controls.

R&D looking at Silicalite molecular sieves as means to extract organics from wastewater. Have already performed two tests on methanol water but are waiting on analytical results.

8) Waste Tank Rules

The new standards for hazardous waste storage tanks (secondary containment) will probably be issued as final by June 30 as a result of a lawsuit of the EPA. In the new regulations, 90-day storage tanks will no longer be exempt from hazardous waste storage tank regulations. Within 6 months of promulgation, all hazardous waste storage tanks will have to be inspected. Within 12 months, secondary containment must be installed, unless a risk-based waiver can be obtained. Also, written procedures for responding to leaks will be required.

9) CMA Air Toxics Program

Chemical Manufacturers Association (CMA) has developed a policy they recommend the chemical industries implement with respect to preventing, handling, and communicating major accidental chemical releases of great risk to the community. CMA feels that adopting the policy should prevent imposition of Nuclear Regulatory Commission type controls on the chemical industry. Vista will be evaluating the CMA policy versus development of their own.

10) Groundwater Protection Strategy

A consistent strategy has not been developed yet due to each plant having different materials, requirements, and varying degrees of contamination, etc.

11) Incineration - Vista's Future

The possibility of participating in regional incineration consortiums presently appears to be the best option as opposed to building or permitting our own waste incinerator(s). Some effort in this area have already been initiated as Vista has committed \$12,000 towards evaluation of a consortium to build an incinerator in southeast Texas.

12) Waste Minimization Program

Initial discussions were conducted concerning development of a company waste minimization program or some type of long range environmental planning program which would be sponsored and staffed by representatives from upper management, engineering, R&D, the plants, and others. Ideas from the discussion will be used by Tom Grumbles in formulating a position paper on the subject.

13) New Source Performance Standards (NSPS)

It was stressed that NSPS Standards for specific types of equipment apply to not only new plants but also to new equipment of those types in existing plants. For example, if the VCM Plant installs a new distillation column for recovering carbon tetrachloride, NSPS Standards for Distillation (promulgated July 1986) will likely have to be followed.

14) Spill/Release Reporting to R. D. Gamblin

To date, OKC and LCCP have each reported two incidents and the VCM Plant one incident, with the respective plant manager making the phone calls. Baltimore has issued a letter to R. D. Gamblin outlining their planned reporting protocol which includes a monthly written report with preventative measures outlined.

Also attached is a summary of "Regulations in Progress" that was distributed during the meeting. Let me know if you have any questions or comments.

G. E. Hopkins
G. E. Hopkins
Chief Process Engineer

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cc: PEM MLA PLF SRA WPS MCM VMF JCL MGH ERT PE

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