

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: March 15, 1991

Interoffice
Communication

SUBJ: PROGRESS REPORT

VISTA

1. JCL met with CMA and EPA to discuss progress on Clean Air Act air toxic regulations. EPA is slowly formulating positions on issues and will begin proposing regulations this month defining the scope of the program. No surprises came out of the meetings. Emission standards (MACT) will be based on existing benzene control regulations. Operations at Baltimore, LCCC, and possibly the Aberdeen plasticizer unit will have MACT standards proposed by 11/91 and promulgated by 11/92 if EPA meets the schedule mandated in the Clean Air Act. Compliance with MACT must be accomplished three years after promulgation, 11/95.
2. JCL met with the Hammond Plant and the Hammond Sanitary District and Rhone-Poulenc to work out several issues regarding wastewater permits. Follow-up discussions will occur, but the issues are on a track toward resolution.
3. EPA promulgated the RCRA Boiler and Industrial Furnace rule on February 21. Memos on that subject were issued. LCLAB will be impacted because of ASO burning. LCCP may be affected if future burning of ethanol from the Alcohol Plant or methanol at the Ethylene Plant is necessary. Facilities wanting to burn hazardous waste fuel in boilers or industrial furnaces must file a RCRA Part A by August 21, 1991.
4. JCL participated in phone conversations regarding the regulatory status of LCVCM decoking waste.
5. JCL worked with Premiere and Legal regarding plasticizer contamination beneath a former tank storage area.
6. JCL met with Conoco, Dupont Environmental Remediation Services (DERS) and the Aberdeen plant to discuss activity on the Aberdeen waste site clean-up.
7. JCL coordinated development of Vinyl Institute comments to the State of Louisiana on the most appropriate unit risk factor for the air toxic program.
8. JCL and TGG participated in a CLER Steering Committee meeting.

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TO: R. D. Gamblin

FROM: T. G. Grumbles
DATE: May 17, 1991

SUBJ: PROGRESS REPORT

VISTA

1. JCL participated in meetings of CLER with the European LAB producers (ECOSOL) and the CLER Communications Committee. The lack of anaerobic degradation of LAS is emerging as an issue in both the US and Europe.
2. JCL met with outside counsel to evaluate whether a SARA 313 delisting petition should be submitted to EPA for di-n-octyl phthalate. After final consultation with the Business Area and Legal, it is our intent to proceed with development and submittal of a petition.
3. JCL assisted LCVCM to determine if the plant should apply for a carbon tetrachloride production allowance on behalf of Vulcan under the Clean Air Act stratospheric ozone provisions.
4. JCL participated in meetings regarding classification of several waste streams at LCVCM.
5. JCL submitted a proposal to the Vinyl Institute to review and update the vinyl chloride cancer risk assessment to include metabolic factors in the analysis.
6. JCL reviewed bids for the Blane Phase II and III waste site assessment. Phase II is intended to define the amount and extent of contaminants in the ground. Phase III will present alternatives to remediate the contamination.
7. JCL provided environmental overview training to approximately 60 people at LCCP.

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