A__IED CHEMICAL CORPORATI[illegible]

MEMORANDUM

File ICD Baton Rouge OSHA

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ALLIED CHEMICAL - CONFIDENTIAL

March 29, 1974

To: Mr. R. H. Sand

Subject: Vinyl Chloride

I refer to your memorandum of March 27, 1974 and enclose a copy of my communication to the two divisions dated February 25, 1974. Information from both divisions assures us that we are in compliance with the emergency standard; in fact, our interim internal standard is almost identical to the Labor Department document. Certain excursions take place in the Baton Rouge loading area which are being handled by personal protective devices. I was informed on March 27th that we expect major improvement from interim changes to be completed within the next month.

Mr. Freeman recently returned from an inspection and audit of the Pottsville operation, and has determined that this operation is already in compliance with the temporary emergency standard.

Neither of our plants complies with the permanent standard as currently proposed. Indeed it is doubtful if any plant in the industry could comply without major reconstruction. We expect these facts to be forcefully presented in the hearings on the permanent standard. There are indications that both OSHA and EPA will be responsive to the practical problems involved, and that the eventual permanent standard will not be as inflexible as the initial draft.

There is a growing industry consensus that employee exposures can be reduced to practically any value specified, so long as the "zero exposure" concept does not prevail. Estimates vary, but most projected timetables involve two to three years for accomplishment, with additional non-productive capital of about 10 - 20% for polymer plants and approximately 5% for monomer plants. Out-of-pocket cost increases in monomer plants are expected to be nominal; in polymer plants the figure most often quoted is about 2¢/lb. Most PVC convertors (extrusion and molding plants) intend to focus their major effort on

tighter specifications on residual monomer in their purchased raw material. Modest investments in local ventilation facilities may also be required.

The most important consideration yet to be resolved is a potential conflict between the OSHA requirements and EPA requirements on the control of the working atmosphere vs control of the general atmosphere. Unless new technology is developed, there is no known feasible method for removing trace quantities of vinyl from large volumes of air. Thus, the general policy of decontamination of vents which carry carcinogens may be unworkable in practice. What may be needed is a compliance position based on improved internal ventilation, and reliance on stack design and atmospheric dispersion followed by photo-chemical interaction between the vinyl and other components of the atmosphere as the ultimate means of control.

W. S. Ferguson

WSF:mn

Attach.

cc: Messrs. E. W. Callahan
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