

Industrial Health And Environment Newsletter

PLAINTIFF'S
EXHIBIT
DUP-1983

NO. 78-1

BEAUMONT WORKS

March 7, 1978

Foreword

This is the first of a new series of newsletters. They are intended to help keep you informed about some items of interest, with an occasional sermon, in the fields of industrial health and environmental control, especially as they relate to our activities at Beaumont Works. Since these are intended to interest and benefit you, please give us feedback. Let us know what you find interesting, what bores you, what you want to see more of, less of, or not at all; give us your reactions, criticisms, and suggestions. Address Mail Area #42 or dial Ext. 9295.

For this first issue, let's take a brief look at a few of the more important issues during 1977.

NPDES Permit Adjudication - Still Unresolved

In December, 1974, our plant received a permit from EPA under the National Pollutant Discharge Elimination System. We immediately officially objected to some of the limitations and requirements in the permit as being either unreasonable, unnecessary, or baseless. That action, in regulatory jargon, is termed a "request for an adjudicatory hearing." Ten months later EPA granted our request. We have done a lot of work to get ready for a hearing, but the agency has not yet scheduled one. Apparently, EPA thus far has regarded our situation as relatively unimportant. That is a correct assessment: our discharge is non-toxic and has far less suspended solids than the intake from LNVA. We are now hoping to meet with EPA within the next couple of months (we have repeatedly offered to do so in the past two years) with the expectation of resolving the remaining issues. Some have previously been resolved just by the passage of time.

pH Limits Being Met - Continuously

One of the requirements of our NPDES permit which we did not protest is, beginning July 1, 1977, we had to meet pH limits of 6.0 - 9.0 continuously. Late in 1976, after our two outfalls were merged, we discovered that we didn't have a chance of meeting that limitation--we would be in violation about 10 to 15 times per month. Through the fine efforts of a large number of people on the plant, and at a cost of about \$250,000, the problem was solved. Thus far, after some early startup problems, our discharge has remained continuously within the pH limits. That is no small feat considering the diversity and sometimes perversity of our operations.

(Over)

DBE 1342268

DUP 0501905

DU 001564

March 7, 1978

Other Items on Aqueous Wastes

Broad generalizations are dangerous, but here's one that's true: Beaumont Works made tremendous improvements in the quality of the water discharged into the Neches River from the plant operations. Despite several expansions, we are normally meeting substantially lower permit limits on total suspended solids, chromium, lead, biological oxygen demand and chemical oxygen demand. The one notable exception is vanadium. That story is too long and involved to deal with here, but we are in the midst of negotiating with EPA to resolve the problem. We cleared it up successfully with the State of Texas and we hope the EPA will follow suit. We should learn their position within the next couple of months.

Federal Clean Air Act

Major projects were completed here to meet the regulations affecting our operations. These deal mainly with control of hydrocarbon emissions. It took a lot of work and was terribly expensive, but the regs are being met. The two outstanding accomplishments here are the abater in Acrylonitrile and the carbon adsorbers in "Hypalon," which are exceeding the expectations of even their principle creators.

But now the requirements of the FCAA Amendments of August, 1977, must be met. We'll talk more about this subject in future issues. Meanwhile, if you're confused by what you've read and heard, take solace in the fact that many of the regulators are too. In summary, the main impact is industrial growth in our area will be considerably slower than the previous pace.

Industrial Hygiene, Occupational Health, Workplace Exposure to Toxic Substances

This subject certainly is not new to Du Pont or to Beaumont Works, but the ground rules are changing. Although we remain, as has always been the case, committed to controlling workplace situations to prevent adverse effects to the health of all employees, we now have the added obligation to do so in strict compliance with detailed standards developed by the federal Occupational Safety & Health Administration. Until recently, standards on asbestos and respiratory protection were the only specific health standards which applied to us. Early this year, OSHA standards on benzene and acrylonitrile will become effective. Standards on several other materials handled here are in the development process.

An increased awareness on the part of all of us has developed toward many substances that we deal with in our daily lives, both at work and at home. Our efforts at Beaumont Works were aided by a Wilmington S&F inspection aimed at occupational health last October. They said informally that you are doing a very good job. But they also showed us many places where improvements are needed. Action has been initiated or completed on their recommendations. You will be hearing much more on this general subject in the future.

Remember, let us hear from you.

RLM/fb

DBE 1342269

DUP 0501906

DU 001565