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PLAINTIFF'S EXHIBIT

UC-1803

ENVIRONMENTAL PROTECTION/OCCUPATIONAL HEALTH

PRODUCTION MANAGER'S SUMMARY REPORT - SOUTHERN REGION

January 1979

REGULATIONS

Texas:

EPA Delegation of Authority for New Source Performance Standard (NSPS) as well as National Emission Standards for Hazardous Air Pollutants (NESHAPS) review has been granted to the Texas Air Control Board.

The Linear Alcohols Production Department requested an amendment to TACB Order 74-3 involving the distillation of a concentrated waste stream for odor controls. Since the product mix for this unit no longer contributes to the odor problem for which the waste distillation was originally required, we requested deletion of that requirement to improve operating effectiveness. The facts were reviewed at both local and state levels and agreement reached on a technical basis to allow staff presentation of an amended Board Order for TACB approval in February without the necessity of a public hearing.

An EPA Brownsville plant audit was conducted in January. No problems were found. Special emphasis was placed on PCB procedures and little emphasis on asbestos handling. Concurrently, an EPA sample team took composite samples for toxic compound analyses.

A construction permit exemption was requested from the Texas Air Control Board (TACB) for the Seadrift Low Pressure Polyethylene Catalyst Precusor Storage System.

The TACB has determined that both the "G" prototype and G-5000 LPPE Resin Degassing Systems are exempt from construction permit procedures. The EPA has also determined that the two systems are exempt from PSD Review for hydrocarbons. However, EPA indicated that potential particulate emissions (from the "G" Prototype) exceeded 100 tons per year and will require PSD Review for particulates.

The TACB was issued a fourth quarter report covering the "Solid Catalyst Storage Facilities" for LPPE. The project is 90% mechanically complete with the start-up forecasted for March, 1979.

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WATER

Brownsville: Radian Corporation analyses of seawater for PCB's in the Port of Brownsville area indicate that levels are less than 1 ppb (detectable limit 0.1 ppb) and that UCC is not a contributor. The EPA limit for PCB in water is 1 ppb. A summary report will be issued.

of the month.

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AIR

Brownsville: The plant EIA is updated and the "Summary of Ratings" is being reviewed by Plant Management. These ratings will be forwarded to EP engineering for use in evaluating the impact of the proposed energy systems expansion.

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