

5/23/84

cc. [REDACTED]

PERSONAL & CONFIDENTIAL

TO: [REDACTED]

FROM: [REDACTED]

C-8 MEETING SUMMARY
5/22/84 - WILMINGTON

THE REVIEW WAS HELD WITH [REDACTED]
[REDACTED] IN ATTENDANCE. COPIES OF THE CHARTS USED ARE ATTACHED.

THERE WAS A CONSENSUS THAT C-8, BASED ON ALL THE INFORMATION AVAILABLE FROM WITHIN THE COMPANY AND FROM 3M, DOES NOT POSE A HEALTH HAZARD AT LOW LEVEL CHRONIC EXPOSURE.

THERE WAS AGREEMENT THAT A DEPARTMENTAL POSITION NEEDED TO BE DEVELOPED CONCERNING THE CONTINUATION OF WORK DIRECTED AT ELIMINATION OF C-8 EXPOSURES OFF PLANT AS WELL AS TO OUR CUSTOMERS AND THE COMMUNITIES IN WHICH THEY OPERATE.

THERE WAS CONSENSUS REACHED THAT THE ISSUE WHICH WILL DECIDE FUTURE ACTION IS ONE OF CORPORATE IMAGE, AND CORPORATE LIABILITY. LIABILITY WAS FURTHER DEFINED AS THE INCREMENTAL LIABILITY FROM THIS POINT ON IF WE DO NOTHING AS WE ARE ALREADY LIABLE FOR THE PAST 32 YEARS OF OPERATION. CORPORATE IMAGE DISCUSSION CENTERED AROUND THE PERCEIVED DILIGENCE VERSUS OUR POLICIES IF WE ELECTED TO STOP WORK.

CURRENTLY, NONE OF THE OPTIONS DEVELOPED ARE, FROM A FINE POWDER BUSINESS STANDPOINT, ECONOMICALLY ATTRACTIVE AND WOULD ESSENTIALLY PUT THE LONG TERM VIABILITY OF THIS BUSINESS SEGMENT ON THE LINE. FROM A BROADER CORPORATE VIEWPOINT THE COSTS ARE SMALL.

THE BASIS FOR A DECISION AT THIS POINT IS SUBJECTIVE AND IS MADE MORE DIFFICULT BY OUR CURRENT UNDERSTANDING OF TECHNOLOGY AND COST, AND THE IMPACT ON THE FINE POWDER BUSINESS. IT'S NOT AN EASY AND OBVIOUS DECISION AS FOR EXAMPLE TBSA WAS.

EID602999

[REDACTED]

LOOKING AHEAD. LEGAL AND MEDICAL WILL MOST LIKELY TAKE A POSITION OF TOTAL ELIMINATION. THEY HAVE NO INCENTIVE TO TAKE ANY OTHER POSITION. THE PRODUCT GROUP WILL TAKE A POSITION THAT THE BUSINESS CANNOT AFFORD IT. THE END RESULT, IN MY OPINION, WILL BE THAT WE ELIMINATE ALL C-8 EMISSIONS AT OUR MANUFACTURING SITES IN A WAY YET TO BE DEVELOPED WHICH DOES NOT ECONOMICALLY PENALIZE THE BUSINESS, AND ADDRESSES THE C-8 EMISSION AND EXPOSURES OF OUR DISPERSION CUSTOMERS.

SOME INFORMATION WHICH WE JUST DEVELOPED 5/21/84 IS THAT DETECTIBLE LEVELS OF C-8 ARE IN BOTH THE LUBECK, W.V. AND THE LITTLE HOCKING, OHIO WATER SYSTEMS. WE SHOULD HAVE QUANTITATIVE NUMBERS IN THE NEXT TWO WEEKS. ALSO WITH THE DEVELOPMENT OF OUR CURRENT FINE POWDER EXPANSION PLAN, WHICH TAKES CAPACITY UP TO 8.2 MMAP, THROUGH A COMBINATION OF EQUIPMENT AND RECIPE CHANGES, C-8 AIR EMISSIONS WILL RISE FROM THE CURRENT 12,000 LBS./YR. TO 25,200 LBS./YR.. THE INCREASE FOR THE COMBINED DIVISIONS WILL INCREASE FROM A CURRENT 16,000 TO 25,200 LBS./YR. OR A NET 9,200 LBS. DUE TO A 4,000 LB. OFFSET WITH THE IMPLEMENTATION OF THE TBSA PROGRAM. THIS WILL INCREASE FURTHER WITH THE INSTALLATION OF THE THIRD DRYER (12MMAP FINE POWDER) TO ABOUT 37,000 LBS./YR..

C-8 WILL NOW BECOME A MAJOR ISSUE ON ALL FURTHER PROJECT WORK IN THE FINE POWDER AREA, STARTING WITH THE WILMINGTON SCOPE REVIEW 6/29/84. IN PREPERATION FOR THAT REVIEW I HAVE REQUESTED THE ESD GROUND LEVEL CONCENTRATION STUDY BE REDONE USING THE NEW PRODUCTION VOLUMES AND RECIPE (45% SOLIDS). ALSO WE HAVE INCLUDED IN THE DRAFT SCOPE OF WORK A NEW SMALL EXHAUST SYSTEM IN THE FRONT END OF THE DRYER BED TO TRY TO CATCH MOST OF THE C-8 IN A MUCH LOWER VOLUME AIR STREAM. THE PROJECT WILL PUT THIS STREAM TO THE EXHAUST STACK. THE INTENT IS TO FIRST REDUCE IN PLANT EXPOSURE, AND SECOND LEAVE A FUTURE CAPABILITY FOR TREATMENT OF THIS RELATIVELY CONCENTRATED STREAM.

I BELIEVE WE NEED TO SIT BACK DOWN WITH THE NEW INFORMATION WE NOW HAVE, AND THE FEEDBACK WE HAVE GOTTEN FROM THESE MEETINGS AND JOINTLY WITH PUTNAM REVIEW OUR PLANT POSITION. RAINES AT ONE POINT HAD REJECTED REDUCTION AS AN OPTION. THIS NEEDS TO BE INCLUDED IN OUR THINKING AGAIN.

EID603000