

Internal Letter



Rockwell International

Date 30 June 1988

No

TO

(Name, Organization, Internal Address)

· G. W. Campbell
· Health, Safety, and Environment
· Building 111

FROM

(Name, Organization, Internal Address, Phone)

· A. J. Petrocchi
· Hazardous Materials Control
· Building T452F
· 7007

**SUBJECT: COMMUNITY RIGHT-TO-KNOW
TOXIC CHEMICAL RELEASE REPORTING: SUMMARY AND CONCERNS**

Per your request, this is a summary of the chemical release data submitted to the Environmental Protection Agency (EPA), the possible concerns they may raise in the public's mind, and some suggestions on how to prepare a response to these concerns.

The EPA's "Toxic Chemical Release Reporting" under Community Right-To-Know regulations requires covered facilities to submit a report of releases to all environmental media for chemicals on their Toxic Chemical List and which are used over defined annual thresholds. This is now an annual requirement.

Ten chemicals were identified which were on the list and used over this year's threshold of 10,000 lbs. Release data for air, land, and water as well as waste treatment methods and off-site waste shipment information were prepared by Rockwell and submitted to EPA and the Colorado Department of Health by DOE/RFAO in time to meet the 1 July 1988 deadline. A summary of this data is enclosed.

All of the data will be made available to the public on a national public data base beginning approximately the first quarter of 1989. This will surely raise the visibility of the data significantly.

Over the past few months, consultant newsletter advisories have repeatedly cautioned their clients about public reaction to this environmental release data. The public is used to thinking of chemical exposure in terms of parts per million or parts per billion. The release data is presented in terms of pounds (or tons) released per year. Of particular concern is how well prepared a facility will be to explain the meaning of tons released per year of a chemical with respect to community exposure.

Of the data submitted, the air emission data for three solvents appear to be of particular concern and to a lesser extent for two acids:

- * 65 tons released per year of Carbon Tetrachloride
- * 60 tons released per year of Freon 113 (Freon TF)
- * 40 tons released per year of 1,1,1-Trichloroethane (TCA)
- * 15 tons released per year of Hydrochloric Acid
- * 15 tons released per year of Nitric Acid

Of these, Carbon Tetrachloride raises most of the concerns since it is a suspected human carcinogen.

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As consultant advisories have also cautioned, we should begin preparing our response now. Dependent upon the level of concern, some suggestions for doing this may include:

- A well developed and easily understood explanation or presentation of the release data and its meaning for community exposure
- Atmospheric modeling to determine a range of possible community exposure concentrations and interpretation of its meaning
- * Monitoring both on-site and in the community (some recent independent Carbon Tetrachloride monitoring data will be published this fall for the Arvada area and shows negligible concentrations) *
- * Substitutions (currently an active program for Freon and TCA)
- * Engineering stack controls such as activated carbon adsorption trapping for the organic solvents and more efficient scrubbers for the acids

To the best of our knowledge, however, none of these releases appear to violate any existing regulations. Nevertheless, the likely community perception of the releases as a problem should be addressed.



A. J. Petrocchi, Program Administrator
Hazardous Materials Control

Enc. (1)

cc:

R. J. Erfurdt
J. D. McCarthy
T. F. Lewis

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COMMUNITY RIGHT-TO-KNOW
TOXIC CHEMICAL RELEASE REPORTING

RELEASE SUMMARY*

AIR FUGITIVE	AIR STACK	LAND	WATER	SHIPPED OFF-SITE	ANNUAL USE	CHEMICAL
<500	1500	-0-	-0-	-0-	17,000	AMMONIA, ANHYDROUS
-0-	130,000	-0-	-0-	-0-	370,000	CARBON TETRACHLORIDE
3900	120,000	-0-	-0-	2	130,000	FREON 113 (FREON TF)
<500	30,000	-0-	-0-	-0-	170,000	HYDROCHLORIC ACID
<500	<500	-0-	-0-	-0-	33,000	HYDROGEN FLUORIDE, ANHYDROUS
28,000	31,000	-0-	-0-	-0-	3,700,000	NITRIC ACID
-0-	280	-0-	-0-	-0-	23,000	PHOSPHORIC ACID
-0-	<500	-0-	-0-	-0-	2,300,000	SODIUM HYDROXIDE (SOLUTION)
<500	1400	-0-	-0-	-0-	69,000	SULFURIC ACID
990	81,000	-0-	-0-	960	110,000	1,1,1-TRICHLOROETHANE (TCA)

* ALL DATA EXPRESSED IN LBS. AND ROUNDED TO TWO SIGNIFICANT DIGITS

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