Memorandum

ALLIED Engineered Materials

Allied-Signal Inc.
Morris Township, New Jersey

February 22, 1989

TO: J. Privette

FROM: D. L. Hawkins

Fluorglas SARA

SUBJECT: SARA Section 313 -
Air Dispersion Modeling
Fluorglas (John St., McCaffrey St., and River Road 2 Plants)

Attached are the results of the air dispersion modeling done by Bill Hague. Bill modeled the air emissions reported under Section 313 of SARA which were greater than 1,000 pounds per chemical for the year 1987. For Fluorglas, this meant that emissions of toluene and xylene were modeled for John Street and McCaffrey Street, and ammonia emissions were modeled for River Road 2. Bill has included an explanation of the assumptions made, data used, etc, as well as a summary of the results for each location.

Although there currently is no "standard" for the fenceline concentrations of chemicals emitted from our facilities, Allied has established screening criteria for use as a reference for comparing calculated concentrations resulting from routine plant emissions. The screening guidelines were set in order to assist in prioritizing emission reduction opportunities. The guideline for a first pass screening is 1/42 of the TLV for chemicals which are not carcinogens, and 1/420 of the TLV for chemicals which are known or suspected carcinogens, or which are reproductive toxicants.

The fenceline concentrations of the chemicals modeled are well below the appropriate fraction of the TLV:

	TLV (ug/m3)	Fraction	Criteria (ug/m3)	Model Results (ug/m3)
John Street				
Toluene	375,000	1/42	8,929	46.3
Xylene	435,000	1/42	10,357	25.8
McCaffrey Street				
Toluene	375,000	1/42	8,929	105.8
Xylene	435,000	1/42	10,357	56.8
River Road 2				
Ammonia	18,000	1/42	429	1.64

Although the 1987 levels of toxic chemical releases at all three Fluorglas locations are within the applicable corporate guidelines, we anticipate that increased public concern regarding all "toxic chemical releases" may promote significantly greater regulation in this area. Therefore, you should be alert to any opportunities for emissions reductions, particularly where these can be implemented cost-effectively. If you have any questions concerning the information presented above, please call me at extension 3558.

Dana L. Hawkins

cc: K. Brownell
J. E. Cooper
W. J. Hague
M. L. Heth