To: File

From: K. G. Akins
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Interoffice Communication

VISTA

Subject: **VCM FILTER CARTRIDGES NO LONGER A HAZARDOUS WASTE**

Rodger Collins' Natural Team presented the data on the new stripping procedures for VCM filter cartridges. The new stripping procedures have repeatedly shown to reduce VCM concentrations to below the TCLP level for vinyl chloride (200 ppb).

Rodger's Natural Team will handle the training of the remaining vinyl shifts on the new stripping procedures. The new procedures involve relocating the steam inlet and outlet on the filter packs to allow recovery and removal of more of the vinyl chloride.

During testing of filter cartridges stripped using the new procedures, a correlation was developed between the TCLP and slurry residual test. This correlation showed that if the sample showed less than 5 ppm residual vinyl chloride that the amount of vinyl chloride extracted during the TCLP test would be less than 200 ppb. This testing was conducted by the Aberdeen and Lake Charles laboratories.

During testing, it was also discovered that if you "sniff" over 1 ppm that the filter pack may be over the TCLP level. This "sniff" test will be used to determine if further testing is necessary to determine if the filter cartridges are a hazardous waste.

All filter cartridges passing the "sniff" test will be treated as non-hazardous wastes and will be disposed of as such. Any filters not passing the test will be handled and disposed of as a hazardous waste.

Kenneth G. Akins

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Environmental Coordinator