

INTER-OFFICE MEMO

TENNECO CHEMICALS, INC.

ENV. SCIENCE
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TO Distribution AT DATE December 9, 1976
FROM J. P. Sandstedt AT Piscataway COPY TO
SUBJECT EPA/VCM Compliance Projects -
Waiver Requests and Compliance Schedules

Submissions have been made to EPA Region II and Region VI representatives, requesting equivalencies and waivers of compliance with specific paragraphs of the Vinyl Chloride Standard, for Flemington/Burlington and Pasadena, respectively. The Standard required that each waiver request include a proposed schedule of compliance.

The attached is a concise summary of the proposed schedules, as submitted to EPA, for easy reference.

J. P. Sandstedt
J. P. Sandstedt

JPS:db

Attachment

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COLORITE 009072

EPA/VCM COMPLIANCE
COMPLIANCE SCHEDULES PROPOSED TO EPA REGIONS
AS PART OF EQUIVALENCY/WAIVER REQUESTS
SCHEDULE REQUIREMENTS

1. Issue Purchase Orders By -
2. Start Construction By -
3. Complete Construction By -
4. Be in compliance By -

<u>Waiver or</u> <u>Equivalency</u>	<u>Burlington</u>				<u>Flemington</u>				<u>Pasadena</u>			
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>
Reactor Opening												
Homopolymer	-	-	-	10/19/76	1- 1/15/77	4/1/77	7/31/77	9/11/77	4/15/77	10/15/77	8/1/78	10/1/78
Copolymer	10/1/77	11/1/77	4/30/78	6/1/78	-	-	-	-	-	-	-	-
Dispersion	8/1/77	9/1/77	11/30/77	12/15/77	-	-	-	-	-	-	-	-
Slurry Stripping												
Homopolymer	-	-	-	10/19/76	-	-	-	-	3/15/77	11/15/77	8/1/78	10/1/78
Copolymer	-	-	-	10/19/76	-	-	-	10/19/76	-	-	-	-
Dispersion	7/1/77	12/1/77	10/19/78	10/19/78	-	-	-	-	-	-	-	-
Monomer Rec'y -C/A	8/1/77	12/1/77	10/21/77	10/21/77	8/1/77	12/1/77	10/21/77	10/21/77	5/1/77	4/1/78	8/1/78	10/1/78
Relief Valves	5/1/77	10/21/77	10/21/78	10/21/78	5/1/77	10/21/77	10/21/78	10/21/78	-	-	-	-
Load/Unload Lines	5/1/77	7/1/77	10/1/77	10/1/77	5/1/77	7/1/77	10/1/77	10/1/77	5/1/77	4/1/78	8/1/78	10/1/78
Slip Gauges	NA	4/1/77	8/1/77	8/1/77	-	-	-	-	5/1/77	4/1/78	8/1/78	10/1/78
Leakage from Pump, Compressor & Agitator Seals	4/1/77	5/15/77	2/1/78	2/1/78	5/1/77	7/1/77	8/1/78	8/1/78	12/1/76	2/15/77	2/28/77	2/28/77
Opening of Equipment	8/1/77	9/1/77	1/1/78	10/21/78	8/1/77	9/1/77	1/1/78	10/21/78	5/1/77	4/1/78	10/15/78	10/15/78
In Process Waste- water, Water Stripper	12/1/77	1/1/78	10/21/78	10/21/78	12/1/77	1/1/78	10/21/78	10/21/78	3/15/77	11/15/77	8/1/78	10/1/78

NA - Not Applicable

COLORITE 009073

EPA/VCM COMPLIANCE (Cont.)AS PART OF EQUIVALENCY/WAIVER REQUESTSSCHEDULE REQUIREMENTS

1. Issue Purchase Orders By -
2. Start Construction By -
3. Complete Construction By -
4. Be in Compliance By -

Waiver or Equivalency	Burlington			
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>

Pilot Plant Facilities	-	-	-	-
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Analytical Procedures	4/1/77	NA	1/15/77	12/15/77
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Flemington			
<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>

NA	NA	3/31/77	6/30/77
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4/1/77	NA	11/15/77	12/15/77
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NA - Not Applicable

Pasadena			
<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>

-	-	-	-
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4/1/77	NA	11/15/77	12/15/77
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COLORITE 009074

Attachment A

Proposed Amendments to the National
Emission Standard for Vinyl Chloride

EPA's proposed amendments to the National Emission
Standard for Vinyl Chloride, 40 C.F.R. Part 61 Subpart F,
shall embody the following concepts:

- A. The ultimate goal of zero vinyl chloride emissions and EPA's intention to reduce emissions toward this limit will be expressed.
- B. The 10 ppm limitation under the existing standard will be proposed to be tightened to 5 ppm based on EPA's judgment that technology required by the existing standard can achieve the lower standard, with the following additional proposed features:
 - 1. The 5 ppm standard will be applied to existing sources no later than three years from promulgation of the amendments;
 - (a) Existing sources may institute a review procedure before EPA if the 5 ppm standard cannot be met on the expected compliance date; ✓
 - (i) the review procedure may be initiated by the source notifying EPA in writing no later than one year from the expected compliance date that compliance will not take place; the notification must contain written documentation why compliance is impossible, what interim steps the source will take to reach the 5 ppm standard, and a suggested compliance schedule for reaching the 5 ppm goal;
 - (ii) within thirty days, EPA will confer with the source to consider any oral testimony; the public will be invited to testify or submit written documentation at the conference;

(iii) within sixty days after the conference, EPA will (a) deny the source's request or (b) fashion a schedule for the source's compliance with the 5 ppm standard, accompanied by interim emission limitations if warranted;

2. New sources will be subject to the 5 ppm standard no later than six months from the promulgation of the amendments, but no procedure for relief from this deadline (such as that for existing sources) will be proposed.

- C. Emission limitations for the oxychlorination process and the stripping of dispersion resins, requiring more control of these procedures than the existing standard, will be proposed for new sources.
- D. It will be proposed that existing facilities will not be permitted to expand unless increased vinyl chloride emissions are offset by equivalent reductions in vinyl chloride emissions at the expanding facility.
- E. EPA will undertake a full-scale review of Subpart F of 40 C.F.R. Part 61 beginning three years from the promulgation of any amendments to determine what further changes might then be appropriate to move toward the goal of zero vinyl chloride emissions. In the study EPA will consider recent health data and information concerning technological advances in the control of vinyl chloride emissions.

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