

INTER-OFFICE MEMO

TENNECO OIL P&M

To See Copy To

AT

DATE March 9, 1983

FROM W. R. Fogelsanger

AT Flemington

COPY TO: ~~R. A. Donovan~~
H. R. Horton
W. R. Smickle

SUBJECT

A review of our Environmental Compliance is scheduled for April 19-22, 1983. A group from TOC will conduct the review.

In preparation for this audit, they have requested us to assemble certain information which will help the process to move smoothly.

Please complete the attached sheets which are in your area and return to me by April 4 to allow me time to assemble the complete package.

I have initialed the items in each area.

Thank you.



W. R. Fogelsanger

WRF:ms

Encl.

TEN 4536

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)
(2)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are relief valves connected to a process line, recovery system, or equivalent?		X	
If not, are they equipped with rupture discs?	X		
R.A.D. When sampling, are sample containers purged into a closed process system?	X		
H.H. Are unused portions of samples (10% or more VCM by weight) returned to the process?	X		
W.S. Is the VCM content of equipment reduced as required before opening to atmosphere?			
W.S. Does this plant have a formal leak detection and elimination program?			
a. Has the program been approved by the EPA Administrator?			
b. What is the plant definition of a "leak"? _____			
Is the VCM content of "in process wastewater" reduced as required?			
W.S. Does this plant have Standard Operating Procedures incorporating the VCM fugitive emission requirements?			
W.S. Are emissions data reported in Semiannual Report as required?			
How many reported exceedances were there the last 12 months for:			
W.S. a. Residual VCM content of stripped PVC slurry? _____			
What percent is this of total reported values? _____			
b. Reactor opening emissions? _____			
What percent is this of total reported values? _____			
c. Incinerator VCM emissions greater than 10ppm? _____			
What percent of incinerator operating hours? _____			
Is record keeping performed as required?			
a. Are records kept two years?			
b. Are they destroyed after two years?			

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS

COMMUNITY RELATIONS

(1)

W.S. How many complaints were received from neighbors or other interested parties the last 12 months? _____

What percent of the neighborhood complaints received relate to:

Air _____

Water _____

Noise _____

Spills _____

Solid Waste Disposal _____

Other _____

TOTAL

100%

What percent of the complaints investigated relate to this facility? _____

Describe briefly how complaints are handled and name individual(s) responsible for handling complaints. If written procedures exist, please attach a copy.

When is the senior line manager responsible for local operations informed of citizen complaints? _____

Who is responsible for reporting complaint information to the senior line manager? _____

Does this facility have an emergency contingency plan?

YES NO N/A

Has the emergency contingency plan been updated in the last 12 months?

YES NO N/A

(Please make available a copy of the emergency contingency plan for the Review Team.)

TEN 4538

12/8/82

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

AIR

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)
(1)**

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
RAD What type(s) of ^{Copoly} PVC resin is produced:	Dispersion resin	_____	_____	_____
	Latex resin	_____	_____	_____
	Bulk resin	_____	_____	_____
Does this plant have a fixed vinyl chloride monitoring system in place to continuously monitor VCM emissions?		<u>X</u>	_____	_____
Do exhaust gasses meet the less than 10ppm VCM limit?		<u>X</u>	_____	_____
What sort of control devices are used to reduce VCM exhaust gases to 10ppm or less? <u>INCINERATOR</u>		_____		
W. How many emergency manual vent valve discharges to the atmosphere were reported in the last 12 months?	_____			
W.S. Were they reported within the required time (10 days)?	_____	_____	_____	_____
<u>FUGITIVE EMISSIONS FROM EQUIPMENT IN VCM SERVICE</u>				
RAD Are loading and unloading lines in VCM service degassed thru a control system before opening?	<u>X</u>	_____	_____	_____
Are slip gauges used in the VCM loading/unloading operation?	_____	<u>X</u>	_____	_____
Are slip gauge emissions reduced via a control system?	_____	_____	<u>X</u>	_____
If controlled--what is the control mechanism? _____		_____		
Are all pumps either sealless, have double seals or equivalent?		<u>X</u>	_____	_____
a. Positive pressure maintained between seals?		<u>X</u>	_____	_____
b. Double seal interspace vented to a control system?		<u>X</u>	_____	_____
Are all compressors equipped with double seals or equivalent?		<u>X</u>	_____	_____
a. Positive pressure maintained between seals?		<u>X</u>	_____	_____
b. Double seal interspace vented to a control system?		<u>X</u>	_____	_____
Are all agitators equipped with double seals or equivalent?		<u>X</u>	_____	_____
a. Positive pressure maintained between seals?		<u>X</u>	_____	_____
b. Double seal interspace vented to a control system?		<u>X</u>	_____	_____
c. Other _____		<u>X</u>	_____	_____

TEN 4539

INTER-OFFICE MEMO **TENNECO CHEMICALS, INC.**

To Shift Foremen/Poly Foremen At Flemington

DATE October 14, 1981

FROM R. A. Donovan

At Flemington

COPY TO P. Benn
W. Schomp

SUBJECT EPA Sampling/Monitoring

Please be reminded that the following procedures as regards EPA samples and charcoal tube monitoring are presently in effect.

I. Waste Water Stripper Samples

Take bottoms samples on the 12-8 shift Monday, Wednesday and Friday and have them brought to Q.C. Lab by 0800 hours. Also, take recovered vinyl acetate samples at same time as Waste Water Stripper samples.

II. EPA Slurry Samples

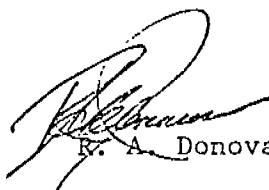
Take 4 oz. EPA slurry sample at request of Analytical Services and have them brought to Q. C. Lab as soon as possible after they are taken.

III. Reactor Opening Samples

These samples are to be taken by J. Durant as they were previously taken.

IV. Charcoal Tube Monitoring

The Shift Foreman will coordinate this program with W. Smickle. The foreman will be responsible for issuing the pumps and documenting the person's activities and other pertinent information for the monitoring period. When possible, W. Schomp will work with W. Smickle in this area.



R. A. Donovan

RAD:ms

INTER-OFFICE MEMO **TENNECO CHEMICALS, INC.**

TO Operating Personnel AT Flemington DATE June 24, 1981
FROM R. A. Donovan AT Flemington COPY TO
SUBJECT REACTOR PRESSURE VENTING TO STRIPPERS

If the need arises to vent reactor pressure to strippers in an attempt to control the batch use the following procedure:

1. Close automatic steam valves if open.
2. Close 1" steam line if in use.
3. Close manual block valves in steam line at stripper.
4. Isolate No. 3 vacuum pump.
5. Adjust recovery line valves at stripper appropriately.
6. Open recovery valve at reactor.

AT NO TIME SHOULD PRESSURE FROM A REACTOR BE VENTED TO A STRIPPER WHEN THE MANUAL STEAM BLOCK VALVE IS OPEN!!

TEN 4541

INTER-OFFICE MEMO **TENNECO CHEMICALS, INC.**

TO ALL OPERATING PERSONNEL AT Flemington DATE November 12, 1980
FROM D. Hershkowitz AT Flemington COPY TO Distribution
SUBJECT STRIPPER 4-OZ. EPA SAMPLES

IT IS ABSOLUTELY ESSENTIAL THAT EACH 4-OZ. EPA SAMPLE BE
FULLY LABELED. THERE ARE TO BE NO EXCEPTIONS TO THIS.

BE SURE THE FOLLOWING INFORMATION IS INCLUDED:

BATCH NUMBER

TIME

REACTOR NUMBER

FORMULATION NUMBER

STRIPPER NUMBER

OPERATOR INITIALS

ALL SAMPLES ARE TO BE BROUGHT TO Q. C. AS SOON AS POSSIBLE,
AND NOT ACCUMULATED IN THE REACTOR BUILDING.

THANKS,



Dennis

cc: 4 Shift Foremen
4 Poly Foremen
W. Schomp
R. Thorsen
12 Reactor Operators
P. Benn
R. Donovan
W. Fogelsanger
D. Scofield
J. Sweeney
M. Wagshul

TEN 4542

To R. A. Donovan

DATE March 17, 1983

AT Flemington

COPY TO J. W. Kachtick
J. T. Sweeney

SUBJECT TCE Unloading

Please instruct your operators in the use of this system and assure yourself that it is being utilized. The TOC audit team scheduled for a visit in late April, and will probably want to see the system. I would like to call on you to explain its operation.


W. R. Fogelsinger

W. R. Fogelsanger
Environmental Coordinator

TEN 4543

TO J. P. Sandstedt AT Piscataway DATE July 11, 1977

FROM R. A. Donovan AT Flemington COPY TO D. M. Hershkowitz
C. F. Rothenbeck
G. I. Rozand
J. T. Sweeney

SUBJECT Slurry Equivalency Program Follow-up
Flemington

To provide verification that the EPA requirements for stripping copolymer slurry are met at Flemington, the following program has been initiated. This program consists of two parts.

- 1) Two samples of stripped slurry will be analyzed each week for VCM content. These samples will be taken on arbitrarily selected days.
- 2) For batches that are not analyzed, achievement of the critical checkpoints will be noted indicating that each batch has been stripped according to the procedure which will enable the EPA regulation to be met.

So that this program may operate effectively, the following arrangements have been made. Production will provide samples to Analytical Services when they are requested. It will be the responsibility of the Analytical Services to request samples each week, on arbitrarily selected days. Analytical Services will analyze the samples and maintain a log of the results. To insure that item 2 is being accomplished, a revision to the "Reactor Charge Sheet" has been made to indicate that the critical checkpoints in the EPA stripping procedure are being met. The achievement of these critical checkpoints will be noted by Production during the normal processing of each batch. The revised "Reactor Charge Sheet", indicating the checkpoints, is attached for your consideration.

If there are any questions on the program, please feel free to call.


R. A. Donovan

RAD:ms

TEN 4544