

INTER-OFFICE MEMO **TENNECO CHEMICALS, INC.****S. R. SHEERAN**

FEB 4 1976

TO	Mr. F. X. Ritter	AT	DATE	January 30, 1976
FROM	Mr. J. Fath	AT	COPY TO	Mr. D. Coldiron Mr. F. X. Dwyer Mr. W. Miringoff Dr. S. R. Sheeran ✓ Mr. C. G. Thompson
SUBJECT	ENVIRONMENTAL ENGINEERING PROJECTS EPA/OSHA, etc.			

There will be a meeting Monday, February 9 at 3:30 p.m. in the main conference room at Piscataway to review all of the projects currently under consideration for compliance in the polymers area.

We plan to review each project in detail and our total plan by which we intend to minimize project expenditures to obtain the necessary compliance results.

Please feel free to invite all personnel whom you feel may contribute to the discussion.

JF:ts

PROJECT: Provide stripping system for PVC plant slurry
PE est. (20 man-wks)

JUSTIFICATION: Necessary to meet EPA VCM regulation
of 400 ppm, ~~if~~ assuming tentative regulation
is approved

TIMING: \$1MM - \$2MM⁺

Rev /4 memorandum 115-479-341

NH₃ Removal ? \$1MM + ?

2nd. Series tower ?

* NH₃ Condenser \$100,000 76-77 Budget

Carbon disposal - \$50M + ?

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ENVIRONMENTAL
PUC

PROJECT: Provide VCM Stripper from liquids in PIR
Plant Recovery Area & Reactor wash water
PE est (10 man-wks)

Justification: Required to meet OSHA regulation
on worker exposure to VCM EPA

Timing: Compliance with regulation required by
April 1, 1976

\$250,000

PRIORITY 4

PROJECT: Eliminate VCM emissions at storage and
loading Area PE est. (20 man-wks)

JUSTIFICATION: MEET OSHA REGULATION & EPA REGULATION
ON VCM exposure & emissions

TIMING - OSHA Regulation effective April 1, 1976

EPA Regulation still tentative but compliance expected
very soon after adoption -

1976 Budget = \$100M '77 BUDGET = \$150M

PROJECT: CONVERT PVC Plant Flare to Smokeless
PE ext. (12 man-wks)

JUSTIFICATION: TENNECO has been cited several times
for flare smoking in excess of TACB
regulation allowable

TIMING: No current deadline - Just good citizen
effort

1976 Budget (\$400M)

Assume the surge gets
a long time to
dilute out.

priority 2

PROJECT: Provide system to eliminate TCE & UCM from
Evacuation Pump outlet - PVC Plant
PE est. (12 man-wks)

JUSTIFICATION: TCE emission is above that allowed
by law (TACB Reg. II) - PVC can be
shutdown by order of TACB if they determine
Tenneco is operating in violation

TIMING: REQ'D. ASAP - TACB will be notified
of violation when the plant's 1975 Emission
Inventory is submitted in Mid-1976
1976-77 Budget (76 = \$400M; 77 = \$200M)

Clean-up loss to air
evacuating refrigerant

PRIORITY 1+

ENVIRONMENTAL
PVC

PROJECT: Provide Stripper to Recover UCM from
Caustic Column Blow down
PE est. (6 man-wks)

JUSTIFICATION: COMPLY WITH OSHA REGULATION on worker
exposure to UCM

Also evaluate: (1) economic justification for
recovery of stripped caustic as
make up to C_2H_2 P.H.
caustic system

(2) methods for removing
and disposing of the Toluene
layer in bottom of caustic
scrubber

TIMING: REQUIRED BY APRIL 1, 1976 FOR OSHA COMPLIANCE

Estimated by
Project Engineer
for record on available
\$ 5.00

PRIORITY 5

OFFSITES

PROJECT. PROVIDE MARINE LOADING EMISSION PREVENTION
SYSTEM.

JUSTIFICATION: Comply with (tentative) EPA regulation on
maritime shipment loading. ENGINEERING WORK
SHOULD BE COMPLETED IN '75 TO INSURE GOOD FAITH COMPLIANCE.

TIMING: Comply with EPA Regulation.

and copy to now.

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PRIORITY X 1

OFFSITES

PROJECT: PROVIDE FACILITIES TO STERILIZE RECYCLED WATER
TO FIRE SYSTEM

1976 BUDGET #13

JUSTIFICATION: PROTECTION OF fire water distribution
system from sulfate reducing bacteria

TIMING: 1976 Capital Budget (\$5M)

PRIORITY 1

OFFSITES

PROJECT: PROVIDE DISPOSAL FACILITY FOR BIOLOGICAL
WASTE TREATMENT SLUDGE
PE est (10,000,000 WEEKS) Budget \$70M
IN 1976 - 1978 INCLUDING P.T.

JUSTIFICATION: ON ANY GIVEN DAY, BRSS VIOLATION OF PERMIT COULD OCCUR
WHICH COULD NOT BE CORRECTED FOR MANY DAYS EVEN ON A DAILY BASIS

TIMING: 1976 Budget

PRIORITY 1 to 1+

OFFSITES
OXID. LAGOON

PROJECT: Rebuild oxidation lagoon dike & spoil area dike

JUSTIFICATION: SERIOUS SPILL VIOLATIONS HAVE BEEN REPORTED IN '75

Timing: 1976 Budget (\$35M) ^{Revised 11-1-75} \$250,000 ^{General}

PRIORITY 1+

ENVIRONMENT
MePH

PROJECT: ELIMINATE EMISSION FROM MePH storage TANKS

JUSTIFICATION: TACB has withdrawn ~~Penneco~~ MePH storage
tank emissions exemption from reg. V

TIMING: 1976-77 BUDGET (AGOM)

PRIORITY 3

ENVIRONMENTAL / PVC

COMPLETE OPERATING DOCUMENTATION - PVC
Plant. (20 man wks)

ATION: EPA Regulation require a written
standard operating procedure for plant

COMPLY WITH EPA REGULATION

add copy to:

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