

CHEMICALS AND PLASTICS

P.O. BOX 471, TEXAS CITY, TEXAS 77590

TO (NAME) J. F. ErdmannDATE June 19, 1979

RECEIVED

COPY TO

SUBJECT

JUN 20 1979

J. F. E.

FROM

P. D. Smith

Here is the letter concerning #2
rectifying column tails which came
up up at today's meeting

Dean

6/20/79 - called NICK + he said that altho the Regulation
does not specifically cover this stream or we like it -
if we don't include it in our calculations at the
base of the Rect. Column - then the controls would get
extended all the way back to the entire Solvent Recovery
system - tanks, etc - and we'd have a lot more reporting
to do as well as monitoring - this feeds of feed around
the 2 was - #2 Rect Column +

the 4 Vaporizing Still.

→ Need open parameters / samples + correlation attempt
for this as well as the Vaporizing Still.

FE



INTERNAL CORRESPONDENCE

P. O. BOX 471, TEXAS CITY, TEXAS 77590

CHEMICALS AND PLASTICS

NAME: Mr. R. N. Wheeler
COMPANY: S. CHARLESTON PLANT
LOCATION:

DATE: January 10, 1977

COPY TO:

☒ Mr. W. A. Messolint/
Mr. L. J. Kunke/
Mr. S. M. Norwood
Mr. W. T. Gray, Jr.
Mr. J. B. Leverton/
Mr. R. E. O'Bryan/
E. P. Files
Mr. R. A. Herrington/
Mr. H. P. Brady

SUBJECT: EPA VCM Regulation, Waiver
Request for Solvent Vinyl Resins,
Sources Following Strippers,
Discussion with Dallas EPA Office

Dear Nick:

I received a phone call Friday from Mr. Martin Brittain of Dallas EPA office who was reviewing our waiver requests and had a specific question about the solvent vinyl process, sources following strippers (page 22 of Waiver Request Package, Solvent Resins). He requested clarification about the stripped solvent stream containing about 1000 ppm VCM which is numerically added into the varnish stream calculation and thus exceeds the 400 ppm allowable level on the resin stream leaving the stripper area. He asked if it was incorporated as part of the resin varnish stream going to resin processing and recovery and I said no it was not a physical part of the resin-containing stream, but was directed back to other areas for further separation and eventual recycle to feed the autoclaves. He indicated that the resin varnish stream was presently in compliance and since this stripped solvent stream is not a part of it that it should not be included. He therefore indicated they would take no action on this waiver request because there was no violation of the 400 ppm level in the stripped resin stream.

There were no questions about what happens to the VCM in these solvents that return to the No. 2 Tank Area and B-114 for separation and recovery. I feel this is a situation which will be properly settled in the future by the Modernization Project and will probably take care of itself. I'm sure there may be differences of opinion on this, but Mr. Brittain felt this was the most understandable way to handle this particular waiver request. In any case, we asked for the waiver originally on the assumption that all the VCM contained in the two streams eventually was released to the air even though the two streams were not joined in any way.

UCC
051617

Mr. R. N. Wheeler
January 10, 1977
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If you feel this is inadequate, unsatisfactory or a possible pitfall,
please let me know and we can look into some other approach.

Very truly yours,


J. F. Erdmann

JFE:lr

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