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

TO P. R. Scarito AT Burlington DATE April 13, 1977

FROM J. P. Sandstedt AT Piscataway COPY TO W. P. Anderson
D. C. Coldiron
W. F. Gabel
N. J. Quist
G. I. Rozand
E. V. Schenke
C. G. Thompson

SUBJECT EPA Compliance - Reciprocating Compressors

Mr. Quist has advised me that the third packing set required for modifying the reciprocating compressors is on order. Our compliance schedule requires completion of these changeovers concurrent with completion of installation of double mechanical seals on our rotating pumps. I do not believe the CAR prepared March 7, 1977 included monies to purchase and install the outstanding packing sets. If this work cannot/should not be handled as a maintenance expense, I recommend prompt preparation of the necessary CAR.

In addition, the Plant should look into requirements to bring the unloading compressors into compliance. Also, it may be necessary to change the SIHI pumps (additive resin) if these cannot be adequately modified.

Compliance with Paragraph 61.65 (b) 3 of the Standard is required by February 1, 1978.

J. P. Sandstedt

JPS:db

MANUFACTURING SPECIFICATIONS

PASADENA HOMOPOLYMER

EFFECTIVE 4/7/77

TEST:	RELATIVE VISCOSITY (56-5-1)	DRY BLEND TIME (56-5-6)	CONTAMINATION (56-5-9)	GELS (56-5-5)	VOLATILES (56-3-1)	VOLUME RESISTIVITY (56-5-7)	BULK DENSITY (56-5-2)	HEAT STABILITY (56-5-8)	SCREENS (56-5-3)				VCM CONTENT (56-6-3)
									+60	+30	+100	-200	
UNITS	-	Minutes, Max.	Specks/100 g., Max.	$\sqrt{N}$/100 in^2 Max.	Wt %, Max.	Ohms/cm^2 x 10^{12} Min.	Lbs/Ft^3	% of Std., Min.	---Cumulative Weight, % ----				PPM By Wt, M
195	1.91-1.97	8.5	20	13	0.4	-	32-37	90	0-3	-	30-60	0-5	10
200	2.00-2.06	8.5	20	13	0.4	-	32-36	90	0-3	-	30-60	0-5	10
225*	2.25-2.31	8.0	20	13	0.4	10	30-34	90	0-5	5-35	30-70	0-5	10
225AG	2.19-2.25	14.0	30	25	0.4	-	30-34	90	0-5	-	30-80	0-5	10
250	2.35-2.41	7.0	20	13	0.4	10	29-33	90	0-3	5-40	40-70	0-5	10
250-3	2.47-2.53	7.0	20	13	0.4	10	30-34	90	0-3	10-40	40-70	0-5	10

*Marketing to select 225 resin for film grade customers with following additional requirements:

Contamination Max. - 15, Average - 10
Magnetic Particles/Lb, Max - 6
Gels, Max - 8/2, Average 5/2
Heat Stability - 110+

Any resin showing unusual or undesirable properties or unusual contamination (e.g. short-stop) not listed above will be E Grade and held for disposition by Marketing.

Reason for Issue: Change 100 mesh screen size requirement on Type 200.

Supersedes specifications issued March 15, 1977

Paul M. Reed

Paul M. Reed Manager Quality Assurance

B

390

5	52
11	138
2	73
8	119
1	29
6	50
11	88
44	3843

AU = 87

391

10	101
8	83
11	59
10	47
17	38
56	3389

52

392

3	99
1	132
8	22
12	583

49

314 − (?)

13

52 − 49 = 93

50 =

20 $\frac{130}{20} = 6.5$

315 (21)

21

313 − 146 = 167

172

~~3014~~ 167

~~198~~

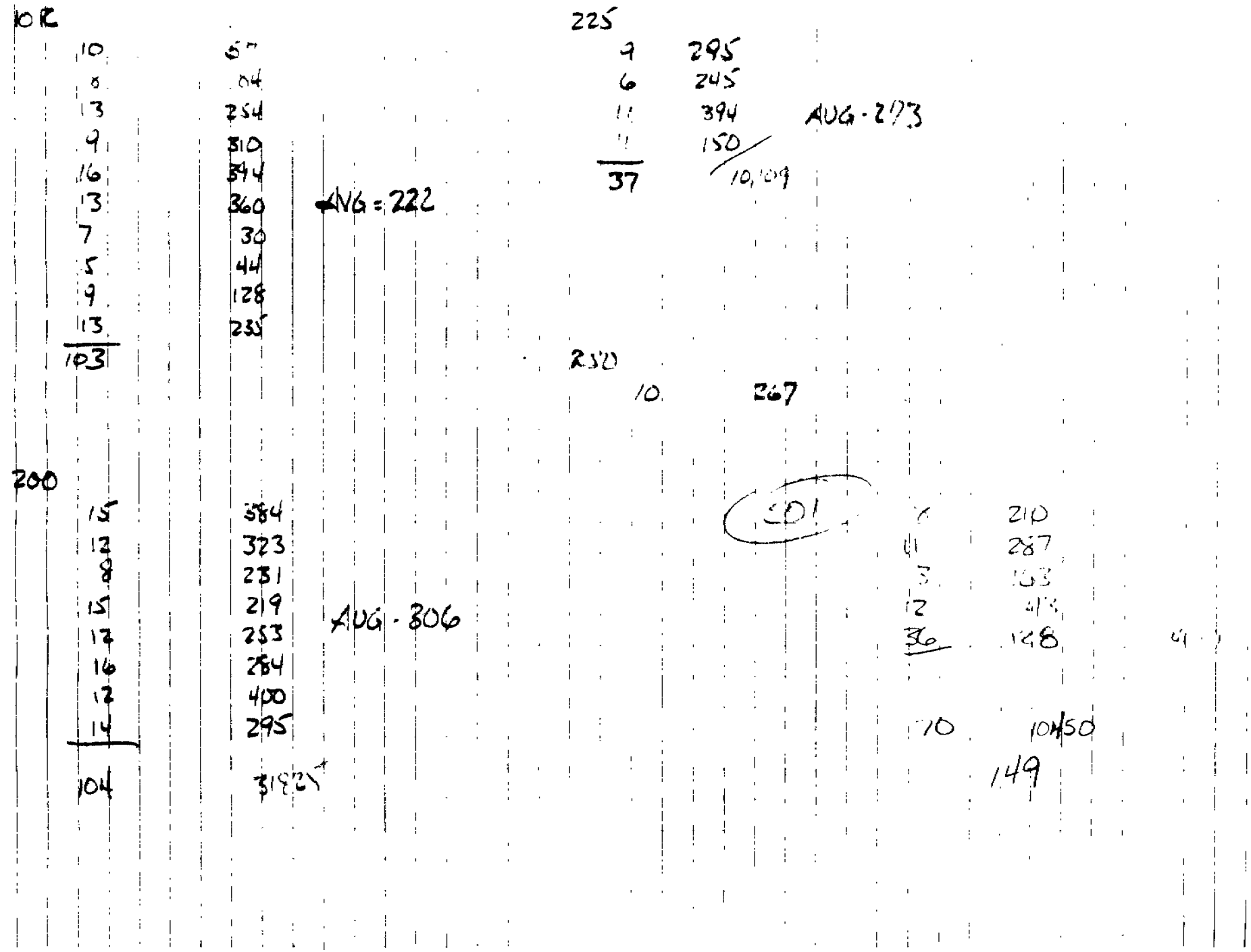
12

52

3 % 15 = 5

$\frac{84}{4}$ 9.

COLORITE 018358



F

314

5	228
10	258
5	136
6	238
11	222
11	189
8	245
56	12309

AV = 219

28(172) = 4836

$\frac{28}{56}$(203) = 17080

315

8	272
8	335
2	182
8	278
26	7447

AV = 286

264

8	225
14	299
2	322
24	6630

AV = 276

32 × 241 = 7726

$\frac{24}{56}$(276) = 4336

78 × 20 Fri = 28

$\frac{28340}{94}$ = 301

"DRAFT"

TCI POSITION ON PROPOSED CHANGES TO
EPA REGULATIONS ON VINYL CHLORIDE

The proposed settlement between EPA and EDF requires that EPA revise its existing standards to reduce the existing 10 ppm standard to 5 ppm. It further proposes to allow OPERATORS 3 years from promulgation of the revised regulation to meet the new standard (compliance date is expected to be about 12/31/80). It also provides for interim review procedures for existing sources if the 5 ppm standard cannot be reached by the compliance date. Such review must be instituted no later than one year from the expected compliance date (this should be about 1/1/80). It seems probable that the settlement will be made but it is not in effect now.

It is difficult to rationalize the EDF proposal to reduce the limits from 10 ppm to 5 ppm if one considers PVC plants only. The quantity of VCM involved is a very small fraction of the total plant emission so the net impact on the ambient air is insignificant. If the EDC-VC plants are also considered, the result is quite different. Those plants have large air streams subject to the 10 ppm limit, therefore it seems probable that the EPF proposal was directed primarily at the EDC-VC operations rather than the PVC plants, though as written it applies to both.

Tenneco Chemicals has, heretofore, based its EPA/VCM Compliance Program planning on meeting a 10 ppm limit by 10/19/78. Technology which Tenneco now plans to use, i.e., carbon adsorption at Pasadena and carbon adsorption or scrubbing at Burlington and Flemington cannot, at its present state of development, assure meeting a 5 ppm standard. A revision in the program at this point to change over to incineration, with the unknowns involved there will probably jeopardize meeting the 10 ppm limit by the legal deadline of 10/19/78. Failure to meet the deadline could result in severe penalties.

Tenneco Chemicals requested waivers of the 90-day time period allowed by the regulation to reach compliance and has received approval of these requests. As part of the submissions, Tenneco Chemicals proposed a time schedule for a series of intermediate steps. Approval of the waivers ~~gives~~ makes the intermediate date the legally enforceable deadlines unless changes are approved by EPA. The final compliance dates cannot be extended since they are fixed by the Federal Statute. The intermediate dates in most cases were determined by working backwards from the final date and constitute a very tight schedule at best. A delay in meeting these dates will jeopardize the final date also.

We have several strategies open:

I. We can continue our present effort to reach 10 ppm by 10/19/78 and plan on reaching 5 ppm by 1/1/81 by either optimization of the control system, or adding on second stage units between 10/19/78 and 12/31/80.

II. We can scrap present plans and start over with a program to install incinerators to assure meeting an ultimate 5 ppm.

III. We can take legal action now in an effort to present the proposed change to the standard; or to revise it so it applies only to the EDC-VC plants.

I recommend Option I for these reasons:

1. The 5 ppm standard will probably be promulgated, but it is not ~~so~~ in effect now and there is no reason for a crash program to ~~reach~~ meet it ~~now~~ at this time.

2. We have a considerable stake in carbon adsorption which can best be protected by using it to the limit of its capability.

3. Scrapping present plans and starting over with incinerators, ~~and~~ with the many questions open about them will make meeting the 10/19/78 target for the 10 ppm standard very doubtful with all the complications that can cause.

4. From a tactical standpoint in dealing with EPA, I think it would be unwise to push too hard against the 5 ppm standard now. A hard line might result in reopening the entire standard and if so, I think we would see the 400 ppm limit on stripping reduced. After the 10 ppm standard is met, I think EPA might be more receptive to requests to waive the 5 ppm for PVC plants if it can be shown that the reduction from 10 ppm to 5 ppm will be very expensive and the reduction trivial.

5. If the ~~mam~~ manner in which this revision has been developed can be attacked on procedural grounds we should do so.

W. P. Anderson

WPA:AS
4/21/77
A04