

S. R. SHEERAN
INTER-OFFICE MEMO
SEP 16 1976
TENNeco CHEMICALS, INC.

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TO D.C. Coldiron AT Piscataway DATE September 13, 1976
FROM J.P. Sandstedt AT Piscataway COPY TO W.P. Anderson
SUBJECT TRIP REPORT
MEETING OF SPI TECHNICAL COMMITTEE
WITH EPA - REPRESENTATIVES OF EMISSION
STANDARDS AND ENGINEERING DIVISION
W.F. Gabel
R.T. Gottesman
R.E. Harmond
R.S. Miller
W. Miringoff
F.X. Ritter
M.K. Rosen
G.I. Rozand
E.V. Schenke
C.G. Thompson

Attendees: SPI Members EPA Representatives
Fred Dehn - PPG Don R. Goodwin
W.C. Holbrook - Goodrich ✓ Susan Hyatt
John Lawrence - SPI Jack Farmer
Nick Wheeler - Union Carbide
Cecil Loechelt - Ethyl
Bill Maddon - Firestone
Gary Baise - SPI Counsel
John Sandstedt - Tenneco ✓

This meeting with EPA was held in order to present an industry request for an additional modification to the revised EPA emission standard on vinyl chloride monomer, as it pertains to R&D facilities. In its revised form, research equipment with a capacity of no more than 0.19m³ (50 gal) are exempted from control. Further, pilot facilities with a capacity of greater than 0.19m³ (50 gal) and no more than 4.07m³ (1100 gal) need comply with paragraphs 61.64(a)(1), (b), (c), and (d) only. Thus, pilot facilities in the range of 50-1100 gal need only control their vents.

NOTE: This is of particular importance to Tenneco since fugitive emission sources need not be controlled. It means, for example, that assuming an OSHA problem is not created the vapor containment system proposed for the Flemington Pilot Plant may not be necessary.

The current standard poses certain problems for SPI members whose pilot facilities are removed from production sites. For example, Union Carbide's has PVC pilot facilities in Bound Brook; there are no production units on site. B.F. Goodrich has facilities more than a mile from its plant.

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All of the industry members present indicated that plant scale "control devices" would be used to reduce emissions from pilot facilities. Thus, in certain instances there exists a potential for contamination of product through recovered monomer.

The third and final point brought out was that in its present form the standard requires development of stripping methods for every new resin type. It was agreed that the stripping technique could be more costly to develop than the product itself.

These items were presented to the EPA representatives, who were quick to recognize the problems. The attached letter was presented to support the SPI position. This position will be modified to include, however, alternative ways of achieving compliance by

a) For those facilities able, complying by adherence to the standard as written

or

b) Reducing total emissions to 0.05 lb vcm per lb. of vcm charged to the reactor.

Alternate (b) was proposed by W.C. Holbrook of Goodrich.

Mr. Goodwin indicated two problems. First, the industry position was presented at a bad time since promulgation of the standard is imminent. Second, he felt that industry (i.e. companies other than Goodrich) would have to present plans, which would be acceptable to the Enforcement Section, to insure compliance. (I have asked Mr. M.K. Rosen to determine whether this latter technique would be feasible and/or beneficial to us. We plan to review this matter before week's end.)

Goodwin requested typical plans from any company interested. We should respond if the alternate is beneficial.

Further, Mr. Goodwin suggested he might try to give industry a basis for a waiver of compliance by inserting a paragraph in the Preamble. This would state, in effect, that a modification to the pilot plant provision would be forthcoming based on "new information" concerning cost-benefit effects.

Other information gleaned during conversations:

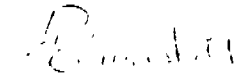
1. Goodrich has had an explosion in a gas holder - will not install except under duress.
2. Several companies considering venting off-gases to boiler house.
3. Use of incinerators considered excessively costly - both capital and operating (PPG, Goodrich)

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4. Several companies looking to solvent recovery (Ethyl, Firestone).
5. Subject of carbon adsorption avoided.



J.P. Sandstedt

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