

TO D. C. Coldiron
FROM J. P. Sandstedt
SUBJECT EPA COMPLIANCE - WAIVERS
ESR-1013

AT Piscataway
AT Piscataway

DATE January 12, 1977

COPY TO W. P. Anderson
W. F. Gabel
F. Kanzler
R. Lojewski
P. Reed
F. X. Ritter
G. I. Rozand
P. R. Scarito (2)
J. T. Sweeney (2)

Mr. Marcus Kantz of EPA called me on January 10 with an update on his review of our waiver requests. In general, these were received very favorably, and we can expect approval as requested in most cases.

Several areas were questioned, particularly, Reactor Opening (Burlington homopolymer) and Suspension Stripping (Burlington and Flemington). These are the areas in which we requested procedural equivalencies. Mr. Kantz indicated that while he recognizes that our procedures are effective, he will require additional data. We reviewed what might be needed as "proof positive." His response was unsatisfactory -- that the data should be "satisfactory to Tenneco."

I will review current operations and available data with Manufacturing, and arrange for the necessary test programs to be implemented. A 3-4 month waiver period will be approved to gather the requested data.

EPA has some questions on our analytical methods which must be answered before equivalencies will be approved. These will be resolved with Q.C.

Finally, Mr. Kantz will probably be unable to review our Leak Detection Programs. A temporary waiver will be issued for such time that he requires to digest our submission, along with those of other PVC manufacturers.

I shall keep you advised of further events.

J. P. Sandstedt

JPS:db

EPA -

Plant Requirements for Interchange Data
- S, G, R, - P, R, R, R

main line raw data - 2 years' record - 4 years
that is stored in final database

what is computer?

storage of data?

EPA

Discussion of Projects

- two schemes - nitrogen break
pump configuration }

NTS: wants to get rid of nitrogen

pressure rating of ship basket

Capacity - 100,000,000 $\frac{1}{y}$

Pure - Polymers

will condense - if not, no change

solids out of vent condenser

is this polymerization

Pilot plant -

FF water

discharge

discharge

water from pilot plant

TCE from pilot plant

pilot plant - discharge to effluent

must be used sewerage

WINDO -

collection system

~~discharge
to sewer
not used for effluent~~

addition of continuous monitors

mechanical equipment indoors - 1000000

FLEMINGTON STEAM BALANCE

NOMINAL BOILER CAPACITY

#1 BOILER 35,000 #/HR

#2 BOILER 25,000 #/HR

TOTAL 60,000 #/HR

PEAK RATE (1976)

35,800 #/HR (1-23-76)

REQUIREMENTS FOR EPA AREA

5,000 #/HR

FLEMINGTON COOLING WATER BALANCE

COOLING TOWER

NOMINAL CAPACITY — 30.0 MM BTU/HR

REFRIGERATION COOLING (2x600 TONS) — 14.4 MM BTU/HR

BRINE COOLING (15 TONS) — 0.2

Rx OIL COOLERS (TRANSMISSION) — 2.3

STRIPPER CONDENSERS (2) — 2.8

STRIPPER JACKETS (2) — 3.8

23.5 MM BTU/HR

ADD'L COOLING FOR EPA

1.3 MM BTU/HR

24.8 MM BTU/HR

REFRIGERATION / RIVER WATER LOAD

NOMINAL CAPACITY (2x600 TONS) — 14.4 MM BTU/HR

REQUIRED FOR EPA — 0.8 MM BTU/HR

VESSEL OPENING PROCEDURE - FLEMINGTON

1. Water fill technique for recovery area.

Water to be drained to Water Stripper prior to start-up.

Compressors
Condensers
K. O. Pots
Vapor Containment Tank

2. Other vessels to be steamed for recovery.

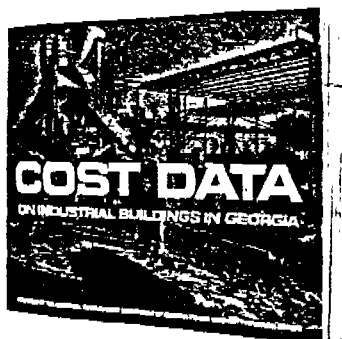
Subsequent water fill for safety purposes, if desired. This water fill can be drained to sewer.

Charge Weigh Tank
Master Mix Tanks (2)
Recovered Monomer Tanks (3)
Recovered VCM Day Tank
Pure VCM Tank
Strippers (2)

3. Bullets to utilize water fill technique.

Recover off empty bullet via Unloading Compressor.
Fill with well water while continuing recovery.
Gradually run off water through new Water Stripper.
(Maximum of 7 days)

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J.W. TALLEY, JR., Vice President
INDUSTRIAL DEVELOPMENT DEPARTMENT

Georgia Power 
P.O. Box 4545W, Atlanta, Georgia 30302

POLLUTION CONTROL

Vinyl chloride's great dilemma

On Jan. 19, the day that the Environmental Protection Agency's new air emission standards for vinyl chloride monomer (VCM) go into effect, the 74 U. S. plants that either make or use VCM will be in a classic "damned-if-you-do, damned-if-you-don't" situation. Those plants that have neither installed control equipment nor received a waiver from the EPA will face citation. And those that have taken steps to comply face a real danger that a pending law suit, in which environmentalists are asking the EPA to review its new standard, may ultimately make their expenditures obsolete.

The dilemma has created an uneasy alliance between the industry and the EPA. "The standards already call for a 90% reduction in emissions, and we just want the EPA to stand by this original action," says John R. Lawrence, technical director of the Society of the Plastics Industry Inc., which has filed a motion to intervene in the suit on the agency's side. And although the EPA has

Should industry comply with air-quality standards that may change?

asked the court not to grant full intervention status to the industry group, it welcomes the SPI's limited involvement. "We got incredible cooperation from the industry, and now this 11th-hour suit is muddying things up," says Ronald S. Naveen, an EPA staff attorney.

Standing firmly against both groups is the Environmental Defense Fund, the controversial suit's sponsor. The Washington-based organization wants the EPA to take a closer look at fresh data emerging from Cesar Maltoni's ongoing experiments, which expose rats to vinyl chloride (BW—Apr. 21, 1975). The EDF also wants the government to differentiate in its standards between new sources and old plants. "We want them to continuously review their standard and force new technology for future plants," explains Jacqueline M. Warren, staff attorney for the EDF.

Compliance is blocked. The specter of the EDF's suit has left the industry unsure of what standard to design for. "We are not canceling any equipment on order, but the suit certainly inhibits us in our planning," says Jackson B. Browning, corporate director for health, safety, and



Producing vinyl chloride: The EPA's standards are still being challenged.

environmental affairs at Union Carbide Corp. "We are continuing to install and design VCM control equipment, but if the EDF petition is approved our ability to comply will depend on the new standards," echoes a spokesman for B.F. Goodrich Co.

Both the government and the SPI agree that the current standards would cost the industry about \$200 million for control equipment, plus \$70 million a year in operating costs. And EPA officials readily accept the industry's reluctance to spend that kind of money when the final requirements remain up in the air. "If the standards were tightened appreciably, I question whether these facilities could continue operating," notes Roger Strelow, the EPA's assistant administrator for air and waste management. He sees little merit in the environmentalists' suit. "If there were a good argument to be made along EDF's lines, I'm sure our own scientists would have been banging on my door," he claims.

Still, Strelow feels it is in the best interests of industry to comply with the standard and hope for the best. "A court would feel much freer to tighten up the standard if industry had not started to meet it," he notes.

The SPI's Lawrence feels that the industry is taking a big chance. Most control technologies involve some form of incineration, activated carbon adsorption, or solvent absorption, he explains, and a concrete standard would let a plant decide which route to follow. "What if a plant orders a \$2 million incinerator that will bring VCM emissions from vents down below 10 parts per million, which the current standard calls for?" he asks. "If the standard goes down to 5 ppm, are they supposed to just scrap the incinerator?"

TO T.I. MOORE
FROM J.P. SANDSTEDT
SUBJECT EPA - REGION VI COMMUNICATION

ATTACHED IS COPY OF LETTER RECEIVED FROM
EPA - REGION VI, REQUESTING ADDITIONAL INFORMATION
PERTINENT TO WAIVER REQUESTS - PASADENA

THIS LETTER WILL SERVE AS "DOCUMENTATION"
OF CURRENT COMPLIANCE STATUS WITH EPA.

EXPLANATORY MEMO AND RESPONSE TO FOLLOW

J.P. Sandstedt
1-19-77

Jelesperatore
1-19-77