

BFGoodrich

The BFGoodrich Company
Geon Vinyl Division
6100 Oak Tree Boulevard
Cleveland, Ohio 44131
216-447-6000

December 11, 1986

Ms. Kelly Meloy
Texas Water Commission
Hazardous and Solid Waste Division
Permit Section
Post Office Box 13087
Capital Station
Austin, Texas 78711

Dear Ms. Meloy:

Because State and Federal solid and hazardous waste regulations have changed somewhat in the last two years, BFGoodrich would like Texas Water Commission (TWC) review of our Catoxid process operations to assure that we continue to operate in full conformance with all currently applicable solid and hazardous waste regulations. You will recall that we reviewed our operations with you and other TWC personnel in 1984 and concluded that the then State and Federal solid and hazardous waste regulations were not applicable. Our operations today are as represented to you in 1984 except that we have not used EMPAC for feedstock supply.

Our Catoxid process (see attached process schematic) is a BFGoodrich patented process which utilizes chlorinated hydrocarbon containing materials (feedstock) as an ingredient to make a new product (ethylene dichloride/vinyl chloride) without distinct components of the feedstock being recovered as an end product. Use of chlorinated hydrocarbon containing materials in this manner serves as a direct substitute for commercial chlorine. Every molecule of chlorine contained in the hydrocarbon containing feedstock displaces the purchase of a molecule of commercial chlorine. Notwithstanding, purchase of commercial chlorine is still necessary to satisfy the total chlorine feedstock requirements for our ethylene dichloride/vinyl chloride production.

In addition to the chlorinated hydrocarbon feedstock produced in the BFGoodrich ethylene dichloride/vinyl chloride production processes, we utilize chlorinated hydrocarbon feedstock from non-BFGoodrich manufacturing operations (see attached feedstock specification).

The chlorinated hydrocarbon containing materials used as feedstock are not classified as solid or hazardous waste in accordance with 40 CFR Part 261.2 and 261.3 even though such feedstock may have previously been managed as solid or hazardous waste. The chlorinated hydrocarbon containing materials used as Catoxid feedstock are not solid wastes as

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defined in 40 CFR Part 261.2 in that they are not discarded materials (abandoned, recycled or considered inherently waste-like) and are not being disposed of, used in a manner constituting disposal, burned, incinerated, reclaimed or accumulated speculatively, used to produce products that are applied to the land, used to produce a fuel or contained in fuels. Such feedstock materials are not required to be managed (including manifesting) as solid or hazardous wastes.

Our Catoxid process is totally enclosed and environmentally sound. Records of chlorinated hydrocarbon feedstock receipt and usage are kept as well as are records of overall Catoxid process operations. The feedstock materials are handled in a manner (pipes, pumps, enclosed above grade diked tanks, concrete pads, etc.) which guard against loss. Wastewaters and vent gasses are processed in TDWR, TACB and USEPA permitted facilities.

Mr. David Hinson and I appreciate the time afforded us in your office on December 10th to review our Catoxid process operations. We would appreciate a letter from TWC confirming your position that our Catoxid operations do not constitute solid or hazardous waste storage, treatment or disposal and that Catoxid feedstock materials are not required by regulations to be manifested.

Should you desire additional information, please contact me at 216/447-7925.

Sincerely,

THE BFGOODRICH COMPANY
Geon Vinyl Division



W. C. Holbrook
Director, Safety, Health
and Environment

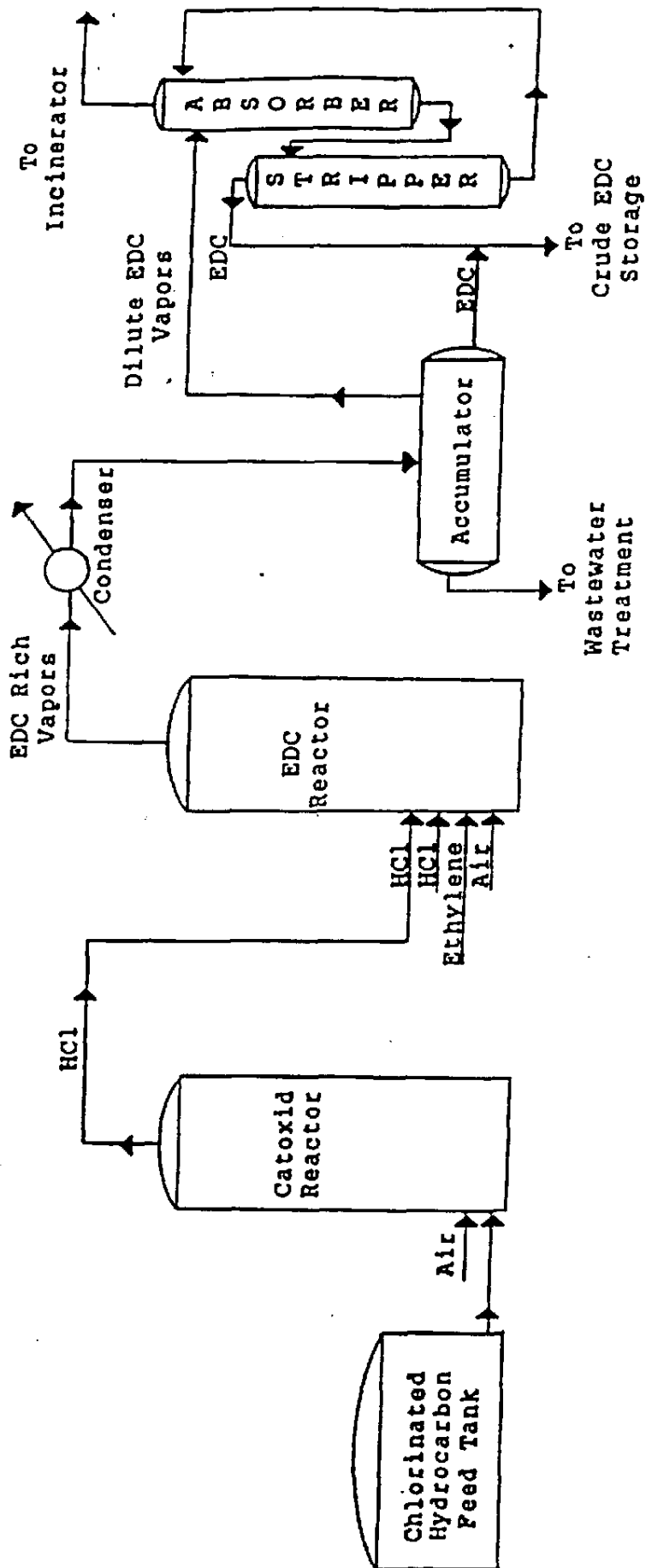
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Attachments

cc: V. Goode/J. Schonaerts
D. Hinson

bcc: S. Guidry/C. Orsborn
J. Lewis/J. Fannin

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CATOXID FEEDSTOCK SPECIFICATION

A) Physical Properties

- 1) Should be a pumpable liquid at typical Houston temperatures. A maximum viscosity of 5 cps is desired.
- 2) Heat Content - Should have sufficient heat of combustion to sustain a reactor temperature of 1000°F. Approximately 4,300 BTU/lb is required.
- 3) Phase Composition - Should be homogenous liquid phase but can contain dissolved or finely divided suspended particles. No free water phase.
- 4) Acidity must be neutral or basic to prevent corrosion in carbon steel tanks and piping.

B) Chemical Properties

- 1) Stability - Should be chemically stable at ambient conditions to prevent exothermic reactions and/or polymer formation.
- 2) The minimum H/Cl atom ratio required is 1.2, but the preferred ratio is greater than 1.4.
- 3) Elemental Composition - In general, any organic compound containing C, H, Cl, O, and N is acceptable (see following specification):

-	Aromatic Content	less than 1%
-	Olefinic Content	less than 10%
-	Aliphatic Content	greater than 89%; prefer chlorinated C ₂ 's, alcohols, ketones
-	No dioxins or furans	
-	PCB's	less than 25 ppm
-	Metals	
	Sodium	less than 10 ppm
	Copper	less than 100 ppm
	Iron	less than 500 ppm
	Molybdenum	total less than 100 ppm
	Chromium	total less than 100 ppm
	Potassium	total less than 100 ppm
	Sulfur	total less than 100 ppm
	Bromine	total less than 100 ppm
	Flourine	total less than 100 ppm
	Nickel	total less than 100 ppm