

INTER-OFFICE MEMO **TENNECO CHEMICALS, INOV. P. ANDERSON**

OCT 30 1978

TO	Mr. J. T. Sweeney	AT	Flemington	DATE	October 30, 1978
FROM	Dr. R. T. Gottesman	AT	Saddle Brook	COPY TO	W. P. Anderson (w/o att
					G. S. Flint "
					M. R. Haymon "
					F. S. Klopp "
					R. H. Marks (w/att.)
					P. T. O'Brien
					W. Rupp
					J. P. Sandstedt

SUBJECT EPA COMPLIANCE ORDER
FLEMINGTON PLANT VCM EMISSION STANDARD

I attach a copy of Paul O'Brien's memo to me of October 27 and a copy of the U.S. E.P.A. - Region II Compliance Order requiring the Flemington plant to be in compliance no later than November 20, 1978. If the plant is not in compliance by this date, Tenneco would be required to cease and shut down any part of the plant which emits or may emit VCM emissions. Essentially, and in simple terms, this would mean a shut down of your plant.

As I discussed with you during my visit to Flemington on October 27, it is extremely vital to maintain the high-level activity currently underway to "shake-down" the new pollution control equipment (particularly the water stripper and incinerators) to solve any operating problems encountered, and to develop the necessary data and analyses which can be presented to EPA to show that we are not only operating all pollution control equipment but that we are operating within the limits required by VCM NESHAPS.

Messrs. Anderson and Sandstedt of my department will be working with you and Engineering to assure that such compliance testing is completed well in advance of the November 20 date.

Problems of any consequence that could lead to our failure to achieve compliance by November 20 should be brought to my attention immediately.

Thanks in advance for your cooperation.

R. T. Gottesman
R. T. Gottesman

RTG:AS
Attachment
B08

COLORITE 009117

W. P. ANDERSON

INTER-OFFICE MEMO **TENNECO CHEMICALS, INC.** OCT 30 1978

TO Mr. R. R. Neugold AT Burlington DATE October 30, 1978

FROM Dr. R. T. Gottesman AT Saddle Brook COPY TO /W. P. Anderson (w/o att.)

SUBJECT EPA COMPLIANCE ORDER
BURLINGTON RESIN PLANT VCM EMISSION STANDARD

G. S. Flint "
M. R. Haymon "
F. S. Klopp "
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J. P. Sandstedt

I attach a copy of Paul O'Brien's memo to me of October 27 and a copy of the U.S. E.P.A. - Region II Compliance Order requiring the Burlington plant to be in compliance no later than November 20, 1978. If the plant is not in compliance by this date, Tenneco would be required to cease and shut down any part of the plant which emits or may emit VCM emissions. Essentially, and in simple terms, this would mean a shut down of your plant.

As I discussed with you during my visit to Burlington on October 27, it is extremely vital to maintain the high-level activity currently underway to "shake-down" the new pollution control equipment, complete any tie-ins, and solve any operating problems encountered. Because of the vulnerability at Burlington as a result of having only one incinerator currently installed, you should plan to take the shut down necessary to repair the HCl leaks as rapidly as possible during this period and bring the incinerator back on stream rapidly. Priority must be given to obtaining the necessary analyses and data points which can be presented to EPA to convince them that not only are we operating all pollution control equipment, but that we are operating within the limits required by VCM NESHAPS.

Messrs. Anderson and Sandstedt of my department will be working with you and Engineering to assure that such compliance testing is completed well in advance of the November 20 date.

Problems of any consequence that could lead to our failure to achieve compliance by November 20 should be brought to my attention immediately.

Thanks in advance for your cooperation.

R. T. Gottesman
R. T. Gottesman

RTG:AS
Attachment
B22

COLORITE 009118

INTER-OFFICE MEMO **TENNECO CHEMICALS, INC.****W. P. ANDERSON****OCT 27 1978**

TO	R.T. Gottesman	AT	Saddle Brook	DATE	October 27, 1978
FROM	P.T. O'Brien	AT	Saddle Brook	COPY TO	W.P. Anderson✓ D.C. Coldiron F.X. Dwyer J. Fath G.S. Flint M.R. Haymon F.S. Klopp W. Rupp J.P. Sandstedt
SUBJECT	<u>VINYL CHLORIDE EMISSION CONTROL REQUIREMENTS</u>				

Attached are two copies of two Orders of the U.S. Environmental Protection Agency requiring compliance by Tenneco Chemicals with 40 CFR §61.60 et.seq. (vinyl chloride emission control requirements of the National Emission Standards for Hazardous Air Pollutants) at our Burlington and Flemington plants no later than November 20, 1978.

Please take note that a violation of the enclosed Orders will subject the Company to a civil action for an injunction and penalties pursuant to Section 113 (b) of the Clean Air Act, as amended, 42 U.S.C. § 7413 (b). In addition, a knowing violation may subject the Company to criminal liability pursuant to Section 113 (c) of the Clean Air Act.

Although the Orders require Tenneco to bring the Burlington and Flemington facilities into final compliance no later than November 20, 1978, we should take immediate action to bring the facilities into compliance in order that any problems which arise during start-up or of which we become aware during the testing process may be solved before November 20.

In that regard, appropriate personnel should be immediately advised that, if it has not already been done, all equipment essential to meeting the vinyl chloride standard should be installed and operating as soon as possible. Further, compliance testing should be completed as soon as possible and all results forwarded to John Sandstedt without delay so that he can report the results of such testing to EPA.

We should avoid at all cost leaving any unfinished details concerning final compliance until the "eleventh hour". Be assured that if either the Burlington or Flemington facility is not in final compliance by November 20, 1978, Tenneco shall be required to cease operation of any part of such facility which emits or may emit vinyl chloride in violation of 40 CFR §61.60 et.seq.

Paul O'Brien
Paul O'Brien

PTO:mn
encl.

COLORITE 009119

Sirs:

Index No. 90108

The within is a true copy of a duly
executed Order which
is on file in the Regional Office of the U.S.
Environmental Protection Agency, Region II.

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION II

In the Matter of

TENNECO CHEMICALS, INC.
(Berlinton, New Jersey)

WITH NOTICE OF ENTRY

ORDER

Meyer Scolnick
Director
Enforcement Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10007
(212) 264-1017

COLORITE 009120

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

In the Matter of

TENNECO CHEMICALS, INC.
(Burlington, New Jersey)

ORDER

Index No. 90108

FINDINGS

1. Tenneco Chemicals, Inc. ("Tenneco") owns and operates a facility on Beverly Road, Burlington, New Jersey, which produces polyvinyl chloride. Said facility is subject to the requirements of Section 112 of the Clean Air Act, as amended, 42 U.S.C. §7412 ("the Act") and the regulatory provisions codified at 40 CFR Part 61, which comprise the National Emission Standards for Hazardous Air Pollutants ("NESHAPS").
2. NESHAPS regulations for vinyl chloride were promulgated on October 21, 1976, and are codified at 40 CFR §61.60 et seq. Tenneco processes vinyl chloride at its Burlington, New Jersey facility, and is therefore subject to the referenced NESHAPS regulations.
3. Pursuant to Section 112(c)(1) of the Act and 40 CFR §61.11 existing sources which were unable to comply with applicable NESHAPS requirements at the time of their promulgation could obtain a waiver of compliance from EPA for a period not exceeding two years from the effective date of the standard involved. In the case of the NESHAPS for vinyl chloride, the two-year waiver period expired on October 21, 1978.

4. By letter of October 9, 1978, and in the course of subsequent telephone communications, Tenneco informed EPA that it would not achieve final compliance with the requirements of 40 CFR §61.60 et seq. by October 21, 1978. Specifically, Tenneco explained that it would not be able to perform the compliance tests required by 40 CFR §61.67 by October 21, 1978. In explanation, Tenneco asserted that unexpected delays in delivery of equipment had occurred which prevented timely completion of the required testing.
5. On October 23, 1978, a responsible official of Tenneco informed EPA that the company had not yet performed emission tests at the Burlington plant as required by 40 CFR §61.67 and was therefore unable to demonstrate final compliance with applicable NESHAPS emission limitation requirements.
6. Therefore, EPA finds Tenneco to be in violation of Section 112 of the Act and 40 CFR §61.67

ORDER

Based upon the foregoing, and pursuant to Section 113(a)(3) of the Act,
IT IS HEREBY ORDERED THAT:

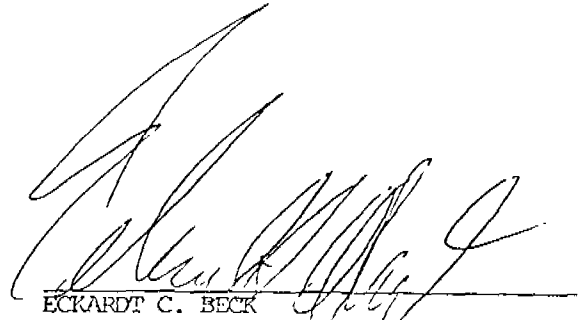
1. Tenneco shall bring its Burlington, New Jersey facility into final compliance with all requirements of 40 CFR §61.60 et seq. (including the testing requirements of 40 CFR §61.67) as expeditiously as practicable, and in no event later than November 20, 1978.
2. Should the results of tests conducted by Tenneco pursuant to 40 CFR §61.67 and this Order disclose noncompliance with the emission

limitation requirements of 40 CFR §61.60 et seq., Tenneco shall upon November 20, 1978 cease operation of any source at its Burlington, New Jersey facility which emits or may emit vinyl chloride in violation of 40 CFR §61.60 et seq., and shall not resume operation of such source except upon receipt of express written authorization from the Regional Administrator, United States Environmental Protection Agency, Region II.

SO ORDERED, EFFECTIVE IMMEDIATELY

Dated: New York, New York

Oct 26, 1978



ECKARDT C. BECK
Regional Administrator
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10007

Sirs:

Index No. 90105

The within is a true copy of a duly
executed Order which
is on file in the Regional Office of the U.S.
Environmental Protection Agency, Region II.

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION II

In the Matter of

TENNECO CHEMICALS, INC.,
(Flemington, New Jersey)

WITH NOTICE OF ENTRY

ORDER

Meyer Scolnick
Director
Enforcement Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10007
(212) 264-1017

COLORITE 009124

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

In the Matter of

TENNECO CHEMICALS, INC.
(Flemington, New Jersey)

ORDER

Index No. 90105

FINDINGS

1. Tenneco Chemicals, Inc. ("Tenneco") owns and operates a facility on River Road, Flemington, New Jersey, which produces polyvinyl chloride. Said facility is subject to the requirements of Section 112 of the Clean Air Act, as amended, 42 U.S.C. §7412 ("the Act") and the regulatory provisions codified at 40 CFR Part 61, which comprise the National Emission Standards for Hazardous Air Pollutants ("NESHAPS").
2. NESHAPS regulations for vinyl chloride were promulgated on October 21, 1976, and are codified at 40 CFR §61.60 et seq. Tenneco processes vinyl chloride at its Flemington, New Jersey facility, and is therefore subject to the referenced NESHAPS regulations.
3. Pursuant to Section 112(c)(1) of the Act and 40 CFR §61.11 existing sources which were unable to comply with applicable NESHAPS requirements at the time of their promulgation could obtain a waiver of compliance from EPA for a period not exceeding two years from the effective date of the standard involved. In the case of the NESHAPS for vinyl chloride, the two-year waiver period expired on October 21, 1978.

4. By letter of October 9, 1978, and in the course of subsequent telephone communications, Tenneco informed EPA that it would not achieve final compliance with the requirements of 40 CFR §61.60 et seq. by October 21, 1978. Specifically, Tenneco explained that it would not be able to perform the compliance tests required by 40 CFR §61.67 by October 21, 1978. In explanation, Tenneco asserted that unexpected delays in delivery of equipment had occurred which prevented timely completion of the required testing.
5. On October 23, 1978, a responsible official of Tenneco informed EPA that the company had not yet performed emission tests at the Flemington plant as required by 40 CFR §61.67 and was therefore unable to demonstrate final compliance with applicable NESHAPS emission limitation requirements.
6. Therefore, EPA finds Tenneco to be in violation of Section 112 of the Act and 40 CFR §61.67.

ORDER

Based upon the foregoing, and pursuant to Section 113(a)(3) of the Act,
IT IS HEREBY ORDERED THAT:

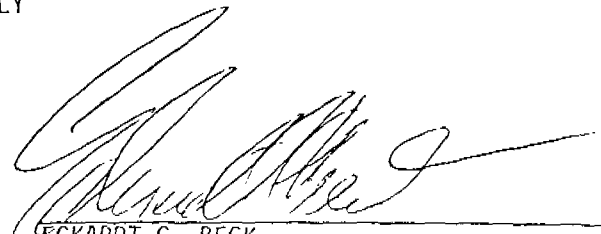
1. Tenneco shall bring its Flemington, New Jersey facility into final compliance with all requirements of 40 CFR §61.60 et seq. (including the testing requirements of 40 CFR §61.67) as expeditiously as practicable, and in no event later than November 20, 1978.
2. Should the results of tests conducted by Tenneco pursuant to 40 CFR §61.67 and this Order disclose noncompliance with the emission

limitation requirements of 40 CFR §61.60 et seq., Tenneco shall upon November 20, 1978 cease operation of any source at its Flemington, New Jersey facility which emits or may emit vinyl chloride in violation of said emission limitation requirements of 40 CFR §61.60 et seq., and shall not resume operation of such source except upon receipt of express written authorization from the Regional Administrator, United States Environmental Protection Agency, Region II.

SO ORDERED, EFFECTIVE IMMEDIATELY

Dated: New York, New York

Oct. 26, 1978



ECKARDT C. BECK
Regional Administrator
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10007



10/25

Burlington 9⁰⁰ on

Bill Mirmick - Just inverter back on yesterday -
short shut down due to fuel oil pressure -
back on line now. less than 1 PP on -

80% water to stripper now = Hypoing end of
week get it to day.

Lower opening going along well.

Stripping - making average 2000 -
4 side have less than 200

Flemington Don Calderon 10⁰⁰ on

Called C.E. of Trans Cost mtr. Westham:
Will check about 11⁰⁰ on and will know
better then. Burner fouled up - will not
work.

Paul C'3 10⁵⁵

Jacked to Murrethop. Order being moved
allows till 11/20 to get into Cambridge. This -
caused our port problem. Some things and is



broad enough to cover us. Asks that we
keep EPA informed of status & progress.

John O'Connell 10/26 2:20 pm

Incinerator: Recovers about 100 lbs feed VC

Flammiter: About 100 lbs for U.C. ??

second call -

10:00 pm - Flammiter
and a buyer going

Incinerator - still having trouble with
water - looks like welding plug in spray
nozzle - cleaning & checking all connections
again. 3 Trane men on hand - will push
all possible - maybe by midnight.

Don

12/23

Burlington

Incrinator ready to go -

Water Stripper. 8 racks will be going within
next 12 hours - putting 12.0 pot
between two units - pot in within
6-8 hrs. Automatic controls can come later

Plastic Stripper - Quality problems - issues
related to stripping.

Lab Emergency

Fluorinator as of 10:00 Sunday

Water Stripper operating well, but lack
pressure control. Putting pressure control by man.

Incrinator ready to start. Wrong oil gun -

Expect back by early pm - Feed by 600 mic
Trickle with Reel on compressor, etc

Slurry Pumpout from stripper - 12.

PLC

Paradise

Further in 10-2 weeks

PLC - Caudex Stripper down - no feed - will be

- 1000 ppm packing

3 Slurry Stripper below 100 ppm - 4 th going
14-20 Stripper running. 2h

Incrinerator 0.5-5 ppm - some problems with instrumentation.

~~John~~

Incinerator Dispersal Stripping - had trouble - plant people think it is EPA Stripping - Producing "stop".

John 10/24

Flemington H₂O ran most of night. Shut down late am - inst - back noon. No liquid.

Main - Dirty H₂O problem continues - 14 in. run max. Paralleling filters. Is taking off liquor now. Waste gas this pm. From say 12 noon - Elliot 2:00 pm.

Everything else good

~~Incinerator~~
Bent. Did not finish KCP out - by noon to day.

Heat up incinerator - to how ready by 11 am complete.

Wiping some changes on H₂O Stripping. Finish this pm.