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TENNECO CHEMICALS

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APR 15 REC'D sent 4.18.77 FYI
DATE April 13, 1977 WPA

TO D. C. Coldiron AT Piscataway
FROM J. P. Sandstedt AT Piscataway
SUBJECT Trip Report - SPI Technical Committee Meeting
Washington, D.C.
April 12, 1977

COPY TO W. P. Anderson
W. F. Gabel
G. I. Rozand
F. X. Ritter
C. G. Thompson

Mr. Rozand and I attended subject meeting; the following summarizes the discussion:

1. The proposed change in the EPA Standard will go through; SPI counsel fully anticipates dismissal of the EDF lawsuit. The proposed settlement was drafted by EPA-EDF lawyers without benefit of EPA technical personnel.

(The Region II NESHAPS coordinator told me today that EPA's proposed amendments have already been drafted, and will issue imminently.)
2. SPI will seek all EPA information since October 12, 1976 (the date the current standard was signed). The intent here is to determine why there is need for a revision. SPI counsel believes there is no new data to warrant the change.
3. It was agreed to seek a public hearing on the proposed amendments. Such a hearing is not required under the law, but would be a soapbox for industry if EPA can be challenged. It would be SPI's intent to "expose" the closed-door compromise entered into by EPA to "get EDF off their backs."
4. SPI counsel suggested an approach which might require each company, or at least a significant fraction, to submit an affidavit to the effect that the proposed amendment and the 5 ppm limit would require complete redesign of control systems. This should have been taken up at the VCM-PVC Producers Meeting today.
5. Shell Chemical has a functioning incineration system; emissions at less than 1 ppm. EPA is to make an emissions test this week.
6. Goodrich is using solvent scrubbing at all sites. At those where their system is functioning they are "far from achieving 10 ppm."
7. Hooker Chemical wants to utilize Tenneco carbon adsorption technology but is holding back pending EPA's action.

J. P. Sandstedt

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