

4-E

INTER - OFFICE MEMORANDUM

Tenneco Chemicals, Inc.

TO: Dr. S. R. Sheeran AT: Saddle Brook DATE: March 11, 1974

FROM: W. P. Anderson AT: Saddle Brook COPY TO: D. R. Keck
 J. F. Kilcullen
 P. A. Lobo
SUBJECT: PASADENA PLANT ✓ H. E. O'Connell
 C. G. Thompson
 T. T. Zuhl

 FEBRUARY 26-27, 1974

The following notes cover miscellaneous items of environmental nature discussed during the course of my visit to Houston the week of February 25.

1. PASADENA PLANT N.P.D.E.S. PERMIT

We have heard nothing further on our application, nor as far as we know, has anyone else on the Ship Channel since a group of permits were issued in July - August 1973.

2. CONSTRUCTION STATUS - PASADENA WASTE TREATMENT PROJECT

Our present estimate gives a 50/50 chance of making the June 1 target date. Barring something unforeseen, we should not be later than June 15.

3. TEXAS ENFORCEMENT AGENCIES

Although both the Texas Air Quality Board and the Texas Water Quality Board have had rather large turnovers in appointed personnel, it appears that Messrs. Barden and Yantis are still in good standing as executive secretaries of the two Boards, so no major policy shifts are anticipated.

4. AMMONIA IN EFFLUENT

We are consistently not meeting the ammonia limits in our T.W.Q.B. permit. The new system may provide enough reduction, however, that is questionable. We decided to make an unsolicited progress report to the T.W.Q.B. staff outlining the work being done on this problem. By keeping the staff posted on our activities, we hope to avoid having to appear before the Board to file a formal application for a variance with the accompanying public exposure.

5. PVC PLANT - PERMIT REQUIREMENTS

At the time we filed for our T.A.Q.B. permit, engineering was not far enough along to permit including all the details of stack heights, etc. required in the application. Messrs. Churchwell, Hourihan, and I went over the permit application in detail to identify if additional information was required. Mr. Hourihan will furnish these details to Mr. Churchwell for transmission to the T.A.Q.B. staff.

I was informed that contracts have been placed for the carbon absorbers on the slurry tank and monomer recovery system vents. After returning here, I learned that there have been some problems in the pilot absorbers.

6. COMPLIANCE WITH T.A.Q.B. REGULATION V - (Hydrocarbon Emission Control)

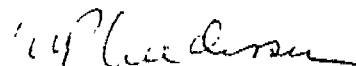
This regulation requires control of hydrocarbon emissions from stationary sources. Three point sources remain: (1) V.C.M. plant vents, (2) Carbon water sump vents, and (3) V.C.M. tank car purges. It is anticipated that the first two will be diverted to existing flares or incinerators before the 1975 deadline. The last is a very small source and can be reduced still further by modification of unloading practices.

7. G.C.W.D.A. FACILITIES CONTRACT

I sat in on a meeting with G.C.W.D.A. to review a first draft of this contract. The only point of disagreement was over who is to operate the secondary plant which will be owned by G.C.W.D.A. The best compromise to avoid split responsibility between primary and secondary treatment phases and to avoid possible prejudice to the tax exempt status of G.C.W.D.A. is for G.C.W.D.A. to operate both sections under contract.

8. E.P.A. OIL SPILL CONTAINMENT AND CONTROL REGULATION

I spent some time on this with Jack Adams of Tenneco Inc.'s Industrial Ecology Department. This regulation is vague and we could not come up with any sound guidelines on applicability or format of plans. We need to get some guidelines out to the plants on this, and I will continue trying to develop something useful on the subject.



W. P. Anderson