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January 11, 1977

Mr. Herbert A. Howlett, Chief Engineer
Delaware River Basin Commission
P.O. Box 7360
West Trenton, New Jersey 08628

Dear Mr. Howlett:

Under provisions of the Emission Standard for Vinyl Chloride, National Emission Standards for Hazardous Air Pollutants 40 CFR 61 - Part F, Tenneco Chemicals must install air pollution control devices and make significant mechanical/procedural changes to reduce the amount of vinyl chloride (VCM) emitted to the atmosphere at its Burlington, New Jersey site. The major control devices include an "in-process-wastewater" stripper and a carbon adsorption system.

These units are of sufficient size and operating character that revision of the existing cooling water system is necessary, which will increase the temperature of the water wasted from the system.

As you know Tenneco operates a waste treatment facility at Burlington. Treated effluent from this facility is mixed with the cooling tower blowdown prior to discharge into the Delaware River. The treatment plant is operated under NPDES permit NJ 0004391.

An average volume of 2050 gallons per minute (gpm), or 4.6 cubic feet per second are discharged, with temperature regulated as follows:

<u>Season</u>	<u>Temperature °C (°F)</u>	
	<u>Average</u>	<u>Maximum</u>
Winter (Nov. - Apr.)	18 (65)	26 (79)
Summer (May - Oct.)	26 (78)	31 (88)

This limitation compares with, for example, that of Public Service Electric and Gas Company's Burlington generating station which discharges at temperatures of up to 116° F (their regulated maximum).

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It is estimated that the changes required will cause a 2.8 C° (5 F°) increase in the maximum discharge temperature of the effluent. We believe that such an increase should have no significant effect on the temperature character of the River, based on temperatures and flows reported in the most recent U.S. Geological Survey "Water Resource Data for New Jersey - Water Year 1975." These data are summarized in Exhibit I.

We will seek from EPA a modification of the temperature limits in our NPDES permit to the following

<u>Season</u>	<u>Temperature °C (°F)</u>	
	<u>Average</u>	<u>Maximum</u>
Winter	25 (77)	31 (88)
Summer	28 (83)	34 (93)

This modification is required to allow the Burlington plant to be brought into compliance with the EPA Standard on Vinyl Chloride.

We request your approval of this proposal so that prompt action may be taken by EPA, permitting Tenneco to fulfill its obligations under the Clean Air Act. Should you have any questions concerning this request, please contact me.

Very truly yours,

TENNECO CHEMICALS



J. P. Sandstedt

Manager of Environmental Engineering

JPS:db

cc: Mr. Robert Reed
New Jersey Department of
Environmental Protection
Bureau of Water Resources

bcc: W. P. Anderson
D. C. Coldiron
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COLORITE 018073

EXHIBIT I
SELECTED DATA FROM USGS
WATER RESOURCE DATA FOR NEW JERSEY
WATER YEAR 1975

<u>Month/Year</u>	<u>Temperature ° C</u> <u>(At Burlington-Bristol Bridge)</u>			<u>Discharge ft.³/sec.</u> <u>(at Trenton, N.J.)</u>		
	<u>Max.</u>	<u>Min.</u>	<u>Mean</u>	<u>Max.</u>	<u>Min.</u>	<u>Mean</u>
10/74	18.5	8.5	13.0	19,900	5860	8570
11/74	15.0	4.0	10.0	18,000	5160	9254
12/74	6.5	3.0	4.0	69,000	8160	19700
1/75	5.5	0.5	3.0	36,200	8200	18640
2/75	8.0	1.0	4.0	88,000	9780	21510
3/75	10.0	2.0	6.0	52,600	11700	23460
4/75	15.0	4.0	10.5	44,800	10800	18120
5/75	24.0	14.0	18.5	26,800	8720	16840
6/75	NA	NA	NA	28,500	6630	14760
7/75	NA	NA	NA	30,100	5540	13750
8/75	NA	NA	NA	9,610	4770	6694
9/75	NA	NA	NA	46,600	3980	12170