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INTER-OFFICE MEMO **TENNECO CHEMICALS, INC.**

TO Dr. R. T. Gottesman AT Saddle Brook DATE 8/12/80
FROM Mr. J. P. Sandstedt AT Piscataway COPY TO
SUBJECT VCM Removal from Low Concentration Effluent Air Streams
-- Avco Everett Research Laboratory

I have reviewed Don Goodman's memo concerning the Avco proposal. First of all, I am not at all convinced that the technique is either technically, or economically, viable. The literature provided by Avco is too general to allow any kind of reasonable evaluation.

Yet, I am more concerned with long-term ramifications. As you are aware, in certain circumstances the Clean Air Act requires the use of LAER technology. Strict interpretation of this requirement would mandate use of Avco technology if they exercised the "implied threat" to demonstrate the technology to the government. I am prepared to recommend that TCI not join with Avco; rather, since the industry might be affected, perhaps SPI through the Manufacturing Technology Committee would be a more appropriate forum.

I am reminded of a similar proposal from Houston Research on the use of ultraviolet radiation to destroy VCM in emission streams. This technique was found to be a curiosity, rather than a commercially viable system.

I am concerned, also, with the wording of Mr. Goodman's memo which does not seem, to me, to suggest any skepticism. Avco, at best, alleges it has such a system--but, at best, theirs is a laboratory system at this point. Don's memo suggests, to me, a certain acceptance of the Avco proposal in an exceedingly positive way. Thus, what is our position regarding "knowledge" of new technology which, based on a prejudiced EPA position, could be defined at BAT or LAER?


J. P. Sandstedt

JPS:cg