

INTER-OFFICE M

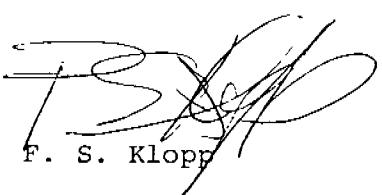
INECO CHEMICALS, INC.

OCT 20 1978

TO	Plant Managers*	AT		DATE	October 18, 1978
FROM	Mr. F. S. Klopp	AT	Piscataway	COPY TO	W. Anderson G. Flint R. Gottesman M. Haymon W. Rupp J. Sandstedt.
SUBJECT	EPA COMPLIANCE				

This is to assure there are no misunderstandings as to the policy regarding EPA compliance. We will strictly adhere to all EPA regulations as interpreted by the Environmental and Regulatory Affairs Department, who has the responsibility to seek legal advice as they feel necessary. This particularly applies to notification and reporting to EPA regarding excursions. I believe Mr. Sandstedt has reviewed these requirements with you and specific questions should be directed to him regarding the regulations.

Any problems in adherence to the policy must be immediately directed to myself or Mr. Rupp.


F. S. Klopp

*C. Crain
R. Neugold
J. Sweeney

cpc

COLORITE 019521

J. Sandstedt
Pace

B-PLANT

Summary

			CONPIT	LATEX
①	T-9, B-1607	10/20	355	150-60, 550
②	T-11, B-1608	10/20-1	353, 365	- 60 300
③	T-14, B-1609	10/21	1020, 1002, 1807	" - 60 74
④	T-10, B-1610	10/21	795, 648, 538	" - 80 230
⑤	T-12, B-1611	10/21	275	" - 50 530
⑥	T-13, B-1612	10/21	136, 359, 418	" - 60 44
⑦	T-9, B-1613	10/22	467, 318	" - 60 300
⑧	T-11, B-1614	10/22	284, 307, 461	" - 120 180
⑨	T-14, B-1615	10/22	294, 894, 2799	" - 60 110
⑩	T-10, B-1616	10/22	846, 3340, 4461	" - 60 190
⑪	T-12, B-1617	10/22	653, 1947, 2055	" - 60 140
⑫	T-13, B-1618	10/23	305, 633, 996	" - 70 56
⑬	T-9, B-1619	10/23	384, 559, 1250	recovery only
⑭	T-11, B-1620	10/23	374, 257, 286	FIRST 1755
⑮	T-14, B-1621	10/23	629, 502, 966	135-60 2838
⑯	T-10, B-1622	10/23	142, 266, 414	140-60 2330
⑰	T-12, B-1623	10/24	174, 389, 792	145-60 670
⑱	T-13, B-1624	10/24	293, 270, 399	140-60-D 4200
⑲	T-9, B-1625	10/24	600, 647, 583	140-60-D 3480
⑳	T-11, B-1626	10/24	528, 328, 463	140-60-D 3081
㉑	T-14, B-1627	10/25	472, 236, 525	140-60-D 2735
㉒	T-10, B-1628	10/25	207, 342, 478	140-60-D 4162
㉓	T-12, B-1629	10/25	1041, 818, 1694	140-60-D 1988
㉔	T-13, B-1630	10/25	224, 253, 371	150-60-D 980
㉕	T-9, B-1631	10/25	476, 271, 375	145-60-D 2880
㉖	T-11, B-1632	10/26	637, 324, 673	145-60-D 320
㉗	T-14, B-1633	10/26	437, 303, 646	145-60-D 3020
㉘	T-10, B-1634	10/26	188, 122, 528	145-60-D 1400
㉙	T-12, B-1635	10/26	270, 410, 434	145-60-D 2990
㉚	T-13, B-1636	10/26	241, 253, 371	145-60-D 760
㉛	T-9, B-1637	10/26	566, 204, 531	145-60 3257
㉜	T-11, B-1638	10/27	360, 640, 623	145:
㉝				
㉞				
㉟				

A-PLANT

Summary

S.S. (1730)
COND. LATEX

1) T-1, B-1667	10/19	384-843-1210	150°F. 30min.	140
2) T-4, B-1671	10/19	1347-2124-3577	150"-50"	330
3) T-5, B-1672	10/19	566-690-749	150-60"	13
4) T-2, B-1673	10/19	346 AVG	150-35	200
5) T-3, B-1674	10/19	258 AVG	150-40+	220
6) T-7, B-1675	10/20	380-935-976	"-80	81
7) T-6, B-1676	10/20	544-966-1352	"-60	190
8) T-8, B-1677	10/20	2573-5656-6444	"-60	100
9) T-1, B-1678	10/20	947-1404-1535	147-150 -40+	480
10) T-4, B-1679	10/20	359-919-978	150-35	110
11) T-5, B-1680	10/21	165-177-183	150-60	160
12) T-2, B-1681	10/21	5971-10033-24666	150-60	110
13) T-3, B-1682	10/21	227-384-541	150-60	420
14) T-7, B-1683	10/21	177-466-548	150-60	180
15) T-8, B-1684	10/21	503-942-1,153	150-64	250
16) T-6, B-1685	10/22	879-2458-2950	150-70	120
17) T-5, B-1688	10/22	360-615-865	150-60	130
18) T-1, B-1686	10/22	6847-13,095-193061	150-50	520
19) T-4, B-1687	10/22	176-188-211	150-60	360
20) T-2, B-1689	10/23	1185-1986-2520	150-50	170
21) T-3, B-1690	10/23	829-1561-1855	"-60	210
22) T-7, B-1691	10/23	315-946-1355	"-60	88
23) T-8, B-1692	10/23	1059-1921-2386	"-60	98
24) T-6, B-1693	10/23	308-367-379	"-60	27
25) T-5, B-1694	10/24	876-1539-2392	"-60	140
26) T-1, B-1695	10/24	476-545-1068	"-45	100
27) T-4, B-1696	10/24	224-212-313	"-40-Draft	47
28) T-2, B-1697	10/24	541-1118-1277	"-50-Draft	1310
29) T-3, B-1698	10/24	352-856-1160	"	419
30) T-7, B-1699	10/25	368-625-1174	"	95

A-Plant

SUMMARY

S.S.
COND

LATEX

31	T-8, B-1700	10/25	423- -564	150-30-D	197✓
32	T-5 , B-1701	10/25	164-258-340	"	530
33	T-5, B-1702	10/25	185-336-422	"	480
34	T-1, B-1703	10/25	218-523-541✓	"	1373
35	T-4 B-1704	10/26	271-431-767	"	640
36	T-3 B-1706	10/26	282-800-982	"	470
37	T-2 B-1705	10/26	327-1096-1512	"	630
38	T-5 B-1709	10/26	159-288-371		2090
39	T-8 B-1708	10/26	1022-1134-2375		2280
40	T-7 B-1707	10/27	360-610-762		
41	T-6 B-1710	10/27			

42 ~~T-1~~

43

44

45

46

47

48

17 Nov 55

Assumptions: Same:

3" DIA 1" DRAIN / 2 HRS

$$0.59 \text{ FT}^3/\text{IN} / 2 \text{ HRS} \times 54 \text{ IN} = 7.07 \frac{\text{FT}^3}{\text{DAY}}$$

TYPICAL ANALYSIS 1300PPM

$$7.07 \times \frac{1300}{1^6} = 0.0092 \frac{\text{FT}^3 \text{ VCM}}{\text{DAY}}$$

$$n = \frac{(1) (0.0092)}{(0.77) (52.5)} \times 62.5 = \frac{0.0016 \text{ GCS VCM}}{\text{DAY}}$$

Less 1.5% or
FILLER

1716-75

Yours are $\frac{10}{11} \times 3.5 \times 9' = 26.25 \text{ FT}^2$ EACH TIME THE SUMO
IS DROPPED.

$$\therefore \text{work done} = 78.75 \text{ Ft}^3/\text{hr.}$$
$$78.75 \cdot \frac{1.56}{1.6} = 204.5 \cdot \frac{F \cdot 2 \sqrt{0.11}}{1.6}$$

$$n = \frac{f}{E} = \frac{(1.09 \times 10^7)}{(52)} = 1.17 \times 10^5 \text{ pairs of } \lambda$$

$$1.17^{1-4} \times 62.5 = \frac{7.33^{1-3} \text{ LBS VOL}}{\text{fl oz}}$$

$$\times 24 \text{ Hrs} = \frac{0.175 \text{ Lb. VCM}}{\text{Day}} \times \frac{\text{From 08 pm / Sump}}$$

Jul 28 1975

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

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. Baymon "
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

RTG:AS
Attachment
B08