

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

To File
 FROM J. P. Sandstedt
 SUBJECT Conference Notes
Meeting on Program Required to
Provide with Information to Supplement
Equivalency Requests - Burlington
ESR-1013

AT
 AT Piscataway

DATE January 27, 1977
 COPY TO W. P. Anderson
 D. C. Coldiron
 W. F. Gabel
 J. W. Poarch
 F. X. Ritter
 P. M. Reed
 G. I. Rozand
 A. C. Siegel
 A. M. Taranto
 Attendees

Attendees: F. Kanzler R. D. Richards
 R. Mathis J. P. Sandstedt
 N. J. Quist P. R. Scarito

EPA-Region II has requested additional data to support our request for procedural equivalencies to the necessity for sampling of each stripper batch before transfer, and each reactor before opening. EPA has indicated a four month waiver period will be granted to provide the time to develop this data.

I. Slurry Stripping - Homopolymer, Copolymer

It is proposed to sample each stripper batch produced in a two, five-day week period in each manufacturing area. Subsequently, samples of every fourth batch produced will be taken for a period of 2-3 months in both areas. Residual VCM will be determined in all cases.

It is the intent of this program to verify the procedure, and its use, for all resin types produced. Thus, the program must be coordinated with Marketing in an effort to cover as many resin types as possible during the concerted two-week sampling period.

EPA WILL GRANT AN EQUIVALENCY ONLY FOR THOSE RESIN TYPES FOR WHICH DATA IS SUBMITTED. Therefore, it will be necessary to follow our productivity during the 4 month waiver period to insure that "adequate" data is available for all resin types produced. In the event of the introduction of new resins, sampling of each batch run will be required.

It was agreed that, in general, the plant is using stripping procedures as submitted to EPA, which had been designed to produce resins having low residual monomer content. Possible exceptions are minor procedural revisions in the 501 and 10R (for CBS) operating procedures.

It was agreed that this program can be readily implemented by the Plant. Two shift analytical coverage will be necessary. Samples taken by the reactor operator will be verified by the foreman, and will be delivered to the Q.C. lab at least twice per shift. It is incumbent on all concerned to insure that no samples are missed. All operating records - procedures and recorder charts - must be retained.

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January 27, 1977

Since the stripping procedures are currently in use, it is expected that no loss in productivity will result from the implementation of this program.

ACTION:

1. Verification that proper procedures are in current use in Plant - MATHIS.
2. Coordination of production schedules - MATHIS, SANDSTEDT.
3. Instruction and implementation of sampling - RICHARDS.
4. Analytical - KANZLER.
5. Collection and analysis of data - KANZLER, SANDSTEDT.

TIMING:

The program is to be initiated as soon as possible. Tentatively, sampling is to be initiated Monday, January 31, 1977.

II. Reactor Opening - Homopolymer

It is proposed to sample the vapor space of each homopolymer reactor, after each batch and before it is opened, for a period of five (5) consecutive days. The procedure developed by Mr. L. Medeiros and Mr. P. Scheiner, and submitted to EPA, will be used.

After agreement by Manufacturing Management, EPA was advised that this method would be implemented on January 21, 1977. The extended recovery procedure does impart a minor loss in productivity.

The sampling program will result in an additional productivity loss since a one-half hour cycle extension is required for sampling.

To implement the program sample taps must be provided for each PVC reactor. This modification will be made during the intensive period of slurry sampling detailed in Section I above. The three areas of study will be followed sequentially because of obvious analytical limitations.

Process Engineering supervision will be required, at least initially, to be sure operating personnel are taught the proper sampling procedure.

ACTION:

1. Issue work order to install sample taps - MATHIS.
2. Installation of sample taps - QUIST.
Ordering information on Conax thermocouple fittings to be furnished by Mr. Kanzler.
3. Analytical - KANZLER
4. Coordination with Process Engineering - SANDSTEDT.
5. Collection and analysis of data - KANZLER, SANDSTEDT.

January 27, 1977

TIMING:

This program is to be initiated upon completion of four week slurry stripping sampling program, and be concurrent with statistical portion of that program.


J. P. Sandstedt

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