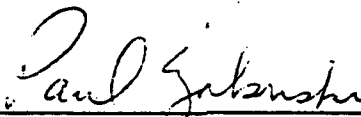


TO PVC Plant Environmental Engineers and Chief Chemists 25-2506 DATE YOUR LETTER
FROM P. M. Zakriski Brecksville R & D Center, D/8506 DATE THIS LETTER July 31, 1978
SUBJECT

Preparations for Compliance Testing of the VCI Absorber Vent

Chuck Titus has been conducting preliminary tests of and visits to the VCI absorber units. From his work he has made some recommendations that I would like to share with you. I hope that these recommendations will simplify the task of demonstrating compliance of the vinyl chloride absorber unit. As you know the deadline for compliance is within three months for all locations. Therefore, it is very important to be prepared to quickly and efficiently demonstrate compliance at each plant. Our strategy for speed and efficiency is proper preparation and set up.

If I can answer any questions or be of further help to you, please call.


Paul M. Zakriski
Corporate Environmental Service

jb

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TO	P. M. Zakriski	FIELD POINT OR DEPT. & BLDG. NO. Brecksville R & D Center, D/8506	DATE YOUR LETTER
FROM	C. E. Titus	FIELD POINT OR DEPT. & BLDG. NO. Brecksville R & D Center, D/8506	DATE THIS LETTER July 28, 1978
SUBJECT			

Up-to-date Report on Vinyl Chloride Emission Program

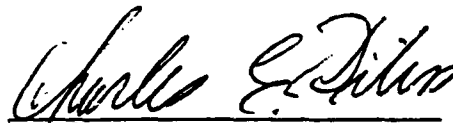
After examining our initial efforts to sample and analyze the exhaust emissions from the vinyl chloride KMnO_4 scrubber at ALTC and the vinyl chloride solvent scrubber at the Louisville plant, we would like to suggest these items be considered:

- A. The exhaust velocities on some occasions appear to vary. The variation at this point has not been measured (LPM or FPM) or is not predictable (as of June 23, 1978).
- B. A number of variables possibly occur in the process that affects the exhaust velocities from the scrubbers (added air pressure, etc.).

Recommendations:

More experience in the process operation would probably minimize or eliminate some of the "up-sets" or variations. I would recommend that a visible flow device (LPM or CFM) be installed on the exhaust of each scrubber for the purpose of indicating to the samplers and visiting inspectors the flow variations. This would enable the persons performing the sampling to proportionately vary the sampling rate.

Each plant laboratory (since the June 2, 1978 memo from P. M. Zakriski to each plant) should condition and obtain response experience with the specific column used in EPA Method 106 Test Procedure as soon as possible.


Charles E. Titus

jb

21958002

LAB REQUIREMENTS

- ITEM # 1 - Obtain column or make up own column - Chromosorb 102 80/100 mesh.
- ITEM # 2 - Condition column.
- ITEM # 3 - Obtain response history of column.
- ITEM # 4 - Standards - recommend gas cylinders of 5, 10, and 50 ppm certified directly by NBS.
- ITEM # 5 - Sample loop - require 1 to 5 ml loop. Our experience leads us to recommend a 10 ml loop.
- ITEM # 6 - Obtain small pump to withdraw a sample from bag to sample loop.

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