



Turner Place, P.O. Box 365
Piscataway, New Jersey 08854
(201) 981-5000

XEROX G5FLINT



CERTIFIED
RETURN RECEIPT REQUESTED

October 9, 1978

Samuel Moulthrop, Esq.
Region II, USEPA
26 Federal Plaza
New York, New York 10007

RE: Emission Standard on Vinyl
Chloride NESHAPS 40 CFR 61,
Sub Part F.

Dear Mr. Moulthrop:

This letter is a current status report on programs to reach compliance with the referenced regulations at our Burlington, New Jersey and Flemington, New Jersey locations. It is an update and confirmation of matters which were discussed via telephone between you and Messrs. Anderson and O'Brien of Tenneco Chemicals, Inc. on October 3, 1978.

In the October 3, 1978 telephone conversation, you were advised by us that because of unexpected, last-minute delays in delivery of some items of critical equipment, we were concerned about our ability to be in compliance with the regulations on October 21, 1978. We also advised that we have vigorously expedited the deliveries with suppliers and have authorized overtime on their part to improve deliveries. Furthermore, we have had our contractors working overtime schedules to the extent material was available. I am enclosing documents relating to delivery delays and existing records.

At this time, we expect to have all equipment essential to meeting the standard installed and either operating, or in the process of starting up, by October 21, 1978. It is still possible that some of the instrumentation required for automatic operation will be delayed beyond that date, but we have determined that by using additional operating labor, at extra cost, we can operate the equipment and control emission within limits of the regulations.

We do not believe that we will have time to conduct complete compliance testing and report the results to you by October 21, though we will, of course, be collecting data as some operations can be stabilized. We therefore, request that you grant us an extension of our waivers for both the Flemington and Burlington plants until November 20 so that we may operate and complete compliance testing.

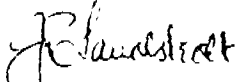
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If you have any questions on this procedure call me at (201) 981-5093.

Yours very truly,

TENNECO CHEMICALS, INC.


J. E. Sandstedt, Manager
Environmental Sciences

JPS:cg

cc: M. Kantz, EPA Region II
W. P. Anderson ✓
P. T. O'Brien

bcc: Mr. D. C. Coldiron - w/o
Mr. F. X. Dwyer - w/o
Mr. J. Fath - w/o
Dr. R. T. Gottesman - w/o
Mr. F. S. Klopp - w/o
Mr. R. H. Marks - w/o
Mr. R. R. Neugold - w/o
Mr. W. Rupp - w/o
Mr. J. T. Sweeney - w/o
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