

6/12
JFE
JBL
DUB
UNION
CARBIDE

INTERNAL CORRESPONDENCE

UC 148-2

P. O. BOX 471, TEXAS CITY, TEXAS 77590

To: 1) J. S. Knight
2) F. S. Provenzano

June 9, 1982

Subject: SVR VCM Testing on Stripped Varnish for NESHAPS

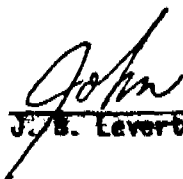
Ref: 1) GFT Request Dated April 14 (attached)
2) JFE Comments Dated May 10 (attached)

I recommend that we not escalate this around regional EPA at this time because:

- 1) It appears that the SVR folks may be near a breakthrough on a new approach which would be acceptable to EPA.
- 2) EPA's assessment of our original approach to the problem from the standpoint of legislative intent as well as our inability to insure control of stripper VCM with less than daily checks is entirely correct. I don't see it as a win situation if escalated.
- 3) Escalation could and most probably would affect our total interface with EPA and TACB, and interface with criticals such as OPDA and permits.

Please advise as to how you want me to proceed.

Thanks,


J. B. Leverton

JBL:ir
Attachments

UCC
051116

ENVIRONMENTAL AFFAIRS STAFF - TEXAS CITY

To _____

Cc _____

Date _____

From: J. F. ERDMANN

Ext. 1126, Bldg. 1

Subject:

Response to Geo Targood - to TBC
Ref Geo's story AAR 10th

(OVER) →

Points to stress -

Also any changes in our
approach needs TBC B
approval as well - since our present
approach is diff from the previous that
TBCB approved.
Believe we should have this data
in hand before going back to
FPA w/ any attempt
to settle the problem
politically.

- 1) Prev. data indicated stopping was not entirely under
control + Prod. staff agreed to see what could be done.
- 2) During Winter shutdown, changes made in autochore gained
control system that reduced chances for upsets in autochore
runners feed to stoppers - also revised stopper paper + system
now simplified to remove unnecessary piping confusion +
sample taking
- 3) Unit operation since start up has shown no serious excursions
in VCM content of stopped runner - Ch Gen Vaughn
- 4) Have started collecting data on stopper parameters to which will
stopped runner VCM data in effort to provide the info then
needed for procedures

UCC
051117

Per Al Goidy -
AUTOCLAVE VARNISH CONTROL TO
STRIPPERS WAS IMPROVED BY -
1) Removing Temp Compensation
devices from DYNASTOL ~~AND~~ DEASAY
instruments and fine tuning
the DYNASTOLS to work properly
to give constant feed to the
dilution ~~the~~ strippers.
2) Installed continuous instead
of spot patch type spot monitoring
of the Dilution tanks to provide
stabilized varnish feed to
strippers.

CHEMICALS AND PLASTICS

P.O. BOX 471, TEXAS CITY, TEXAS 77590

TO (NAME) _____

DATE _____

COPY TO _____

SUBJECT _____

FROM _____

(4)

V. Any information we develop must necessarily be submitted to the TACB, since this is a definite departure from the provisions of the statistical study they had previously approved. The TACB has primary responsibility and EPA has over-ride privileges for this regulation, and EPA would not normally act without the approval of the TACB. If our data proves to be credible, we could probably approach both the TACB and EPA at the same time.

I would be very reluctant to approach either agency strictly on the basis of what we had submitted before, since I really believe we've made some progress in this matter and, although it may not be settled, the agencies would be much more receptive to the present approach, even if it had some minor uncertainties associated with it. I particularly would not want to escalate the situation with EPA in a political manner without some of this recent technical information to support our views.

VI. We will evaluate the present data collection "run" as rapidly as possible when it is completed and see what encouragement can be offered. I will try to answer any questions you may have as we go along.

CT-2015

VTY

J. F. Edmann.

UCC
051119

as of Tues 5/11/82

anything under 100? not noted

<u>Gene Vaughn</u>	<u>VCM</u>	<u>Ad.</u>
UNIT - started 1-31-82		
<u>FEB</u> -	VMCH - 3 ^{30PM} 2/4 444	2225
	VMCC - 3 ^{30PM} 2/13 224	
<u>MAR</u> -	NONE over 50 ppm for whole month.	
<u>APR</u> -	NONE over 60 ppm	
<u>MAY</u> - 7 ^{30A} 5/3 HH - 202		
7 ^{30A} 5/4 HH - 188		

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