

COLORITE 019409

Tenneco Chemicals
A Tenneco Company

Organics and
Polymers Division



P.O. Box 116
Burlington, New Jersey 08016
(609) 386-9200

January 29, 1979

Mr. Eckardt C. Beck
Regional Administrator
U. S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10007

Dear Mr. Beck:

This is to advise you of a relief valve discharge which occurred at our Burlington Plant on January 21, 1979. This was the result of an Operator error (failing to open a downstream valve) which caused the 2nd stage relief valves for the #1 and #2 recovery compressors to lift.

The problem was detected by our Bendix continuous monitoring system and promptly corrected.

Based on the relief valve setting (120psig) and the system compressor capacity, it is estimated that the vinyl chloride loss was 560 lbs. (16 minutes @ 35 lbs./minute).

The routine pressure gauge inspection procedures in effect did not catch this operating error because a different Operator closed the valve due to a downstream condenser malfunction.

Very truly yours,

TENNECO CHEMICALS

R. R. Neugold
R. R. Neugold
Works Manager

RRN:pjd

cc: Mr. Marcus Kantz

BC: Mr. W. P. Anderson
Mr. G. S. Flint/Mr. P. T. O'Brien
Mr. F. S. Klopp
Mr. R. H. Mathis
Mr. J. P. Sandstedt

COLORITE 019410

CERTIFIED MAIL #773740
RETURN RECEIPT REQUESTED

Tenneco Chemicals
A Tenneco Company

Organics and
Polymers Division



P.O. Box 116
Burlington, New Jersey 08016
(609) 386-9200

January 19, 1979

Mr. Eckardt C. Beck
Regional Administrator
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10007

Dear Mr. Beck:

This is to advise you of a relief valve discharge which occurred at our Burlington Plant on January 11, 1979. This was the result of interstage restriction at the discharge of the first stage. The 1st stage relief valve lifted and was open for 34 minutes.

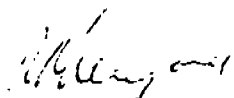
The problem was detected by our Bendix continuous monitoring system and was promptly corrected.

Based on the relief valve setting (50psig) and published venting rates from manufacturer's literature, it is estimated that the vinyl chloride loss was 510 lbs. (15 lbs./minute).

In the future, an intensified inspection program with maintenance as required will be incorporated as operating routine, which should improve compressor operating reliability.

Very truly yours,

TENNECO CHEMICALS


R. R. Neugold
Works Manager

RRN:pjd

COLORITE 019411

Tenneco Chemicals
A Tenneco Company

Organics and
Polymers Division



P.O. Box 116
Burlington, New Jersey 08016
(609) 386-9200

CERTIFIED
RETURN RECEIPT REQUESTED

January 15, 1979

Mr. Eckardt C. Beck, Regional Administrator
U. S. Environmental Protection Agency-Region II
26 Federal Plaza
New York, New York 10007

Dear Mr. Beck:

This is to advise you of a relief valve discharge which occurred
at our Burlington plant on January 5, 1979.

The second stage relief valve on our No. 5 recovery compressor
lifted as a result of ice blockages in the condenser discharge
line. The discharge lasted from 1924 to 1939 hours; based on
pressure setting and published venting rates, it is estimated
that 525 lbs. of vinyl chloride was emitted.

We believe that in this instance the discharge was directly
related to meteorological conditions.

Should you require additional information, please contact me.

Very truly yours,

TENNECO CHEMICALS, INC.

R. R. Neugold

R. R. Neugold
Works Manager
(Orig. signed by J. P. Sandstedt)

RRN:JPS/cg

cc: Mr. Marcus Kantz

COLORITE 019412

Tenneco Chemicals
A Tenneco Company

Organics and
Polymers Division



P.O. Box 116
Burlington, New Jersey 08016
(609) 386-9200

January 10, 1979

Mr. Eckardt C. Beck, Regional Administrator
U. S. Environmental Protection Agency - Region II
26 Federal Plaza
New York, New York 10007

Dear Mr. Beck:

This is to advise you of a relief valve discharge which occurred at our Burlington plant on December 19, 1978. This was the result of a build-up of scrap polymer in the in-line strainer, downstream from the No. 3 recovery compressor. The 1st stage relief lifted, remaining open for a period of 20 minutes (1650-1710 hours).

The problem was detected on our Bendix continuous monitoring system and corrected as expeditiously as possible.

Based on the relief setting (50 psig) and published venting rates from manufacturer's literature, it is estimated that the vinyl chloride loss was 600 pounds (30 pounds VCM per minute).

In the future an intensified inspection program with maintenance, as required, will be incorporated as part of routine production operations and observation of compressor serviceability.

We recognize that this notification should have been made within ten days of the incident; the delay is an administrative error which occurred as a result of the Holiday Season and year-end vacation schedules.

Should you require additional information in this regard, please contact me.

Very truly yours,

TENNECO CHEMICALS, INC.

R. R. Neugold
Works Manager
(Orig. signed by J. P. Sandstedt)

RRN:JPS/cg

COLORITE 019413

Tenneco Chemicals
A Tenneco Company

P.O. Box 849
Pasadena Texas 77501
(713) 479-3411

XEROX: J P Sander  24 Pa

January 19, 1979
(JWK-9-79)

Mr. Bill Stewart
Executive Director
Texas Air Control Board
8520 Shoal Creek Blvd.
Austin, Texas 78758

Dear Mr. Stewart:

The following information is presented concerning a discharge of vinyl chloride monomer to the PVC plant flare system at Tenneco Chemicals' Pasadena, Texas complex resulting from the leakage through a relief valve under circumstances described below. Inasmuch as most of the vinyl chloride monomer released from the process was destroyed by combustion in the flare, the incident may not be a release to the atmosphere within the scope of Section 6.65a of the National Emission Standards for Hazardous Air Pollutants-Vinyl Chloride.

The incident occurred about 11:00 p.m. on January 16, 1979.

The source of the vinyl chloride monomer was the apparent leaking through of the thermal relief valve on the VCM charge filters (L-302C&D). This relief valve discharges to the PVC flare system. The vinyl chloride collects in the flare knockout drum, where it slowly evaporates and is burned at the flare tip. The majority of the safety relief valves in the PVC plant discharge to the flare system for burning rather than going directly to the atmosphere.

It is estimated that 10-20 pounds of vinyl chloride were discharged to the flare system. This estimation is based on the appearance and duration of the flaring.

The flare was found to be smoking slightly on the night of January 16. An investigation as to the source of the discharge to the flare system was initiated by Operations supervision. Subsequently, the thermal relief valve on the VCM charge filters (two parallel filters in the set) was found to be leaking through.

The filters were taken out of service and depressured, stopping the leakage. The relief valve was subsequently replaced.

Additionally, an investigation is continuing in regard to possible modifications to this relief valve system.

COLORITE 019414