



INTERNAL CORRESPONDENCE

JFE

P. O. BOX 471, TEXAS CITY, TEXAS 77390

To: J. B. Leverton
Texas City Plant

May 10, 1982

Subject: Solvent Vinyl Resins, VCM Testing on Stripped Varnish for
NESHAPS Regulation

Dear John:

With reference to George Tacquard's letter of April 14th asking that we explore the possibility of a review of information (previously rejected by EPA) at a higher administrative level to further press for some relief from the unproductive shift analyses under the present NESHAPS Regulation, I have the following comments to offer:

- I. I understand and agree with George's views that we must continue our efforts to get this situation back to a practical and meaningful procedure without all the laboratory effort. As you know, EPA rejected our statistical approach mainly because they insisted from the documents they had from Congressional deliberations in writing up the NESHAPS portion of the Clean Air Act that daily checks were the intent of Congress in this legislation. Accordingly, the EPA said if we could show a daily correlation between the VCM content of the stripped varnish and the operating parameters for the strippers, we could dispense with daily samples for VCM and collect the necessary operating data to indicate compliance via the calibration correlation.

Accordingly, last year we attempted to determine whether we could establish stripper operating parameter correlations with VCM analytical data on the stripped varnish. Unfortunately, the data (obtained with considerable care and attention to the process operations) indicated a general area of parameter control which produced good analytical results, except when some upset condition undetected by the instruments caused high and unacceptable levels of VCM in the stripped varnish samples. We concluded that under the operating conditions of the test period, we could not make adequate explanation from the parameters measured why the VCM excursions occurred, except to assume that we were dealing with a system that could be rapidly and unexpectedly thrown out of a state of equilibrium. This, of course, if indeed it reflected actual conditions, was obviously in agreement with the legislative principle that some daily surveillance was mandatory.

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- II. Production unit personnel familiar with the autoclave and stripping operations were not entirely surprised at this conclusion. They felt that there could be some real operating situations responsible and promised to make some changes during the winter shutdown (Dec & Jan).

Specifically, control of varnish quality from the autoclaves to the strippers was stabilized by the following:

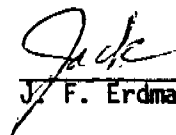
- A. Dynatrol density instrument temperature compensation devices were removed and the Dynatrol systems were carefully recalibrated and fine-tuned to give a more uniform feed to the dilution tanks ahead of the strippers.
 - B. A continuous instead of batch-type spot sampling of the dilution tanks was instituted to provide varnish uniformity to the strippers.
 - C. Varnish piping and sampling arrangements from the base of the strippers was simplified and streamlined in several instances where needed.
- III. VCM analyses since the unit was restarted after the above changes have shown none of the erratic excursions noted previously. This encouraged us to further explore the parameter correlations we had been seeking earlier.
- IV. Unit personnel are in the midst of a second 30-day attempt to determine whether we can establish some reasonable correlation of stripping parameters with VCM analysis. Until we complete this test run and evaluate the results, I would be reluctant to change our approach.
- 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.

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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.

Very truly yours,



J. F. Erdmann

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