

Tenneco Chemicals
A Tenneco Company

ENV. SCIENCE

SEP 20 REC'D



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September 16, 1977

Mr. Paul D. Fahrenthold
U.S. Environmental Protection Agency -
Region VI
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Fahrenthold:

Your letter of August 5, 1977 requested information designed to aid in your attempt to quantify fugitive emissions of vinyl chloride, from facilities within Region VI. Attached please find the survey form, completed by our Mr. T. T. Moore. The data reflects a summary of actual experience, or an engineering estimate based on maintenance records.

It is interesting to note that, with regard to seal leakage, our experience demonstrates that double mechanical seals offer no better protection than the single seals we used before promulgation of the Standard. This confirms the data submitted to the Agency, prior to its promulgation, against the requirements of Paragraphs 61.65(b)3(i), 61.65(b)3(iii) and 61.65(b)3(v).

Should you require additional information, please contact me.

The notice that the table shows before and after should give the change in your words - a bit?

Very truly yours,

TENNECO CHEMICALS, INC.

J. P. Sandstedt
J. P. Sandstedt
Manager of Environmental Engineering

JPS:db

*Pat -
This is a draft response
to EPA Region VI related to fugitives.
You had indicated you wanted
to see it by change limit. Please
advise if revisions are necessary or
if I can send it along*

John

*Revised
9/27*

COLORITE 019092

COMPANY Tenneco Chemicals Inc.LOCATION Pasadena, TexasPLANT PVCDATE 9/2/77BY T. T. Moore

	PRESSURE RELIEFS	PROCESS VALVES	CONTROL VALVES	PUMP SEALS	COMPRESSOR SEALS	AGITATOR SEALS
ESTIMATED NUMBER OF UNITS IN ORGANICS SERVICE	100	750	20	14	4	5
TOT NUMBER OF UNITS/YEAR DISCOVERED WITH A DETECTABLE LEAK	0	100	10	50	20	2
TOT. NUMBER OF UNITS/YEAR REQUIRING REPAIR DUE TO LEAKAGE	0	100	10	50	20	2
NUMBER OF UNITS ON MONITORING SYSTEM	100	750	20	14	4	5

TEST FREQUENCY IS * TIMES/YEAR.NOTES: *1. Reactors are pressure tested on each batch cycle.
2. Other areas of the plant are checked daily.

	FLANGED JOINTS	SCREWED JOINTS	BLINDS
TOT. NUMBER OF UNITS/YEAR DISCOVERED LEAKING & REPAIRED	25	0	3
ESTIMATED; LEAKING UNITS AS PERCENTAGE OF TOTAL UNITS IN ORGANICS SERVICE IN PROCESS	0.6%	0	10%

TEST FREQUENCY IS * TIMES/YEAR.NOTES: Inspected every 1*
NOTE TIME BASE IF OTHER
THEN ONE YEAR.

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