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To: DISTRIBUTION

From: L. Z. KARDOS
Date: March 12, 1987

VISTA

Interoffice Communication

Subject: TOXIC CHARACTERISTIC LEACHING PROCEDURE (TCLP) TESTING PROGRAM FOR PVC

To address concerns raised by the pending TCLP regulation, a testing program has been developed. This letter is to initiate the program at the plant level as well as to summarize the program's objectives and costs. Details of the TCLP testing program are attached.

SUMMARY

Implementation of the TCLP testing program should start immediiately. The necessary samples will be coordinated by Dave Cox and Veldon Messick in Aberdeen and by Steve Christiansen in Oklahoma City. Initially an outside lab will be used to test resin products and off-grades from both the plants. Later, it is hoped to increase TCLP capabilities in-house.

The objectives of the TCLP testing program are to:

1. Identify products with TCLP compliance difficulties by May. This is to allow for corrective action prior to the anticipated January 1988 compliance date.

2. Develop RVCM/TCLP correlations for educating customers on TCLP in the 4th Quarter of this year. This is in an effort to head-off potential commercial issues. Another point is to show that TCLP testing of shipments are not necessary when RVCM is reported.

A lab, Environmental Testing and Consulting, Inc. (ETC), has been selected to expedite the testing since in-house TCLP testing capabilities are limited. The cost of each TCLP analysis is $225 for solids and $75 for liquids. To identify TCLP compliance problems with any of the 5 product resins, Aberdeen should expect 26 to 30 samples as being required. Oklahoma City with a single resin grade should plan on a minimum of 6 samples. The cost for these analyses is around $7000 for Aberdeen and $1500 for Oklahoma City. Evaluation of off-grade products would be in addition to these figures.

To develop true correlations of RVCM vs. TCLP for customer acceptance a much larger number of data points could be required. Here the emphasis would be on better defining the TCLP pass/fail breakpoint and providing enough data to establish reasonable confidence limits. The number of additional samples required to do this for all 5 product resins could range from a minimum of 30 for data with good agreement, to perhaps as many as 100 more if scatter is bad.

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If ETC is used, the cost for this second phase will be one to three times the initial cost. Again, off-grade products are not included in these figures.

Because of the potentially large cost to define the RVCM/TCLP correlation as well as other anticipated future TCLP needs, Aberdeen is investigating acquiring the necessary equipment to conduct TCLP testing.

If there are any questions, please contact me at (713) 596-6876.

L. Z. Kardos

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Attachments

Distribution:

RVCM Team:	cc:	
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