

INTER-OFFICE MEMO

TENNECO CHEMICALS, INC. ENV. SCIENCE

TO P. R. Scarito
J. T. Sweeney

AT Burlington
Flemington

FROM J. P. Sandstedt

AT Piscataway

SUBJECT PROCEDURAL EQUIVALENCIES

DATE June 7, 1977

COPY TO W.P. Anderson
D.C. Coldiron
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F.W. Kanzler
R. Lojewski
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C. Rothenbeck
G.I. Rozand

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At a meeting with Mr. Marcus Kantz, NESHAPS coordinator for EPA, the subject of the procedural equivalencies for slurry stripping (Burlington and Flemington) and homopolymer reactor opening (Burlington) was reviewed. Mr. Kantz indicated that the equivalencies could not be approved without some kind of internal verification.

Accordingly, I "offered" the following: We would sample two batches run on a given day in each area, one day per week. The day of sampling in any week would be arbitrarily selected by the Plant staff, and would not necessarily be the same day of each week. (That is, samples should not be taken every Tuesday.) As such, a quasi-random check would be implemented.

Mr. Kantz indicated that this would be satisfactory, and requested a letter detailing the proposal. The attached letter has been sent in response to this request.

Item 1 refers to a suggestion by Mr. Rozand which will allow us to verify that the procedures are followed correctly. I can review what we have in mind at your convenience. Item 2 is currently plant practice. Item 3 is a very general statement of the sampling schedule.

If you have any questions, please contact me.

J. P. Sandstedt
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JPS:ams
Enclosure

COLORITE 009397