

**F.**INTEROFFICE
MEMORANDUMDate 1 June 1977Subject Calvert City Emulsions ProjectTo V. L. HoeksemaEng. Chem - Trexlertown
(Location, Organization, or Department)From A. J. DiglioMfg. Chem - Trexlertown
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The following comments are made on the Preliminary Project Scope Report. It is suggested these recommendations be included in the project scope as well as those in Byron Bradd's memo attached.

VCM ABATEMENT. (3.2)

This project will comply with the EPA Standards in the Oct. 21, 1976 Federal Register and the EDF-EPA consent decree, and the EPA vinyl chloride waiver compliance schedule issued to APCI. The EDF-EPA standards are anticipated to be proposed by the EPA in June, 1977 which will require 5 ppm VCM concentrations maximum in gaseous emissions at the point of discharge and zero discharge within the life of the project. This project will be required to meet the EDF-EPA standards at start up. Economics for the project consider non-detectable discharge and funds designated within the ten year life of the project for this event.

HYDRAULIC, BOD, SOLID WASTE LOADING (2.6)

Hydraulic and BOD loading will be reduced to levels below the Fiscal Year 1976 operating averages. Solid waste loading from the total plant will not exceed the 6000 lb/day limit and not exceed a 0.3% concentration of solids. This will be partly accomplished by the installation of effluent solids control instrumentation, installed source control facilities and, offline equalization basins. Effluent Process Technology must be developed as part of this project scope to reliably treat EVCL emulsion wastes. This is a very high project risk.

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TO: V. L. Hoeksema

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CALVERT CITY EMULSIONS PROJECT

Plant landfill is not approved for EVC emulsion waste. Moneys should be provided for acquiring an acceptable landfill area.

Provisions must be included so that Toxic Components, Biocides, and Chemicals are not discharged to the treatment plant, but segregated, collected, and incinerated.

During the Economic life of this project, Federal statute requires best available pollution control technology must be implemented for water discharge, i.e. by July 1, 1983. The economics of this project and funds should be designated to include facilities to reduce the waste loading to 1/3 by 1983 and zero (non-detectable) by 1985.

AJD:djm


A. J. Diglio

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