



Lake Charles VCM Plant

Conoco Chemicals Company
A Division of Conoco Inc.
P.O. Box 605
Westlake, Louisiana 70669
(318) 491-5211

January 28, 1980

Ms. Diana Dutton, Director
Enforcement Division (6AE)
United States Environmental Protection Agency
1201 Elm Street
Dallas, TX 75270

Attention: Mr. Martin Brittain

Dear Ms. Dutton:

In accordance with Section 61.07 in Subpart A of the National Emission Standards for Hazardous Air Pollutants, Conoco Chemicals Company, a Division of Conoco Inc., is submitting an application for approval of construction for a proposed expansion at Conoco Chemicals Company's VCM Plant in Westlake, Louisiana. The Plant's capacity will increase from the present production of 700 MM lb/yr. of VCM to 1,000 MM lb/yr. of VCM.

Please find enclosed the application for approval of construction for a proposed VCM Plant expansion along with related information. All material contained in this application, including all related materials and Appendices, shall be regarded as confidential information under Part 2, Subpart B, of Title 40 of the Code of Federal Regulations.

This application is arranged to discuss the changes encompassed in the expansion and the means by which Conoco now complies with the vinyl chloride monomer standards and will comply with the vinyl chloride monomer (VCM) standards following the proposed VCM Plant expansion. This application individually addresses each part of Sections 61.65 through 61.71 of the National Emission Standards for Hazardous Air Pollutants (NESHAP).

The proposed VCM Plant expansion will allow the VCM Plant to reduce permitted VCM emissions from 60.5 tons per year to 11.1 tons per year. Pursuant to EPA's January 16, 1979 Emission Offset Interpretive Ruling (the Offset Ruling), Conoco has established a banking policy with the State of Louisiana in order to preserve its options for the continued expansion of the petrochemical operations in Calcasieu Parish, Louisiana, a non-attainment area for hydrocarbons. Consistent with the Offset Ruling and the State of Louisiana, Conoco requests EPA to recognize the reductions itemized above and, in more detail, in Table I of the following application as banked for use in the future at Conoco's discretion.

*C.R. To make
say to do find
with the state, but
and need approval.*

VVC 000013025

Ms. Diana Dutton
Page 2
January 28, 1980

Conoco considers this to be a complete NESHAP permit application. Your prompt attention to this application for approval of construction of the proposed VCM Plant expansion will be appreciated as we desire to proceed with the project as quickly as possible.

Please direct any further questions on this application to Gary Foshee who can be reached at (318) 491-5062.

Sincerely,

J. A. DeBernardi
Plant Manager

lg

VVC 000013026