



Interoffice Communication

To Garrell Bottoms
From J. C. Ledvina
Date May 19, 1982
Subject ENVIRONMENTAL IMPACT OF DELAYING THE LC VCM OXY CONVERSION

Three areas need to be considered when evaluating the regulatory risks of delaying the LC VCM oxy conversion. I'll speak to each one of these separately.

Banking Agreement with the State of Louisiana

Conoco signed an agreement with the State of Louisiana where we agreed to reduce emissions from the oxy vent by approximately 4,800 tons/year before May, 1983. The State would in turn recognize this reduction as an emissions bank against which future projects would be permitted. The agreement was signed because Louisiana was proposing to regulate the oxy vent through rulemaking.

If the oxy conversion is delayed, a contingent of Conoco people would have to go to Baton Rouge, explain the situation, and ask the State for a release from that agreement. I believe the State would agree to a release.

Amendment to Vinyl Chloride NESHAP's

EPA is in the preliminary stages of developing an amendment to the Vinyl Chloride Standard. One of the proposals being considered by EPA is to require incineration of oxy vents. B.F. Goodrich will oppose this amendment since they have a VCM Plant that would be affected. Conoco could participate in this opposition on the grounds there is no good reason to further regulate oxy vents.

Even if EPA successfully promulgates a provision to incinerate oxy vents, it will not do so before the end of 1984. At that time, affected industries would be given time, probably two years, to abate the oxy vent.

Hydrocarbon Regulation Under the State Implimentation Plan (SIP)

EPA is developing a Control Techniques Guideline (CTG) for Air Oxidation Processes; oxychlorination included. Once a CTG is finalized, states have approximately a year to modify their SIP such that the category of processes for which the CTG was written is regulated. More specifically, EPA will force the states to regulate air oxidation vents.

As of last week, work on this CTG was on hold at EPA. However, it could be restarted any time but at the earliest, the State would not be required to regulate oxy vents before late 1984. Once the regulation becomes effective, we will have a reasonable period of time to implement controls.

VVC 000013770

Garrell Bottoms

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Summary

Regulations to eliminate the LC VCM oxy vent will eventually be promulgated.
This will not happen for at least two years.

J.C. Ledvina/sio

J. C. Ledvina

ajo

VVC 000013771



To

Date

5/25/88

From

Letter to Mrs.:

Father

May

No Letter of disapproval
to organization in same manner
again.

No Const. back greater
than 18 months.

7/2/84

VVC 000013772

NESHAP'S

warehouse & auxiliary

Start 3 months from 5/1
Oct '84