



DOW CHEMICAL U.S.A.

November 14, 1984

LOUISIANA DIVISION
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William H. Davis
Chief, LESHAP Unit
Air Quality Division
Department of Environmental Quality
P. O. Box 44066
Baton Rouge, Louisiana 70804

Dear Mr. Davis:

The following is a point-by-point discussion of the questions raised by the LESHAP inspection report dated November 1, 1984 which covered the inspection of August 21 and 22, 1984.

1. Only about 1/4 of the equipment in Vinyl I and Vinyl II is being leak checked every week and the remaining 3/4 is checked only cursorily.

A copy of the revised Leak Detection and Elimination Plans for our Vinyl I and II plants, which were submitted on January 10, 1984, is enclosed which states our policy of weekly leak checks. We do indeed check equipment that is in vinyl chloride service each week and do more than just a cursory check which we feel is more than adequate.

2. Two area monitor analyzer span gas cylinders were not labelled and not maintained properly.

This was corrected promptly the next day and we should have no further problems in this area.

3. There were missing identification labels on area monitoring pick up points in the Vinyl II facility.

The points located in the field without tags on the day of the inspection were labelled immediately and the others will be audited to make sure they are in compliance with labels.

4. Vinyl II has two storage tanks and one of them, PSV-125 A/C has been granted a variance to use "O" rings on valve seat as pressure seal in SRV, the other vinyl chloride tank has not been granted the same variance.

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PLAINTIFF'S EXHIBIT

DOW-885

Vinyl II actually has three storage tanks and all three have been granted variances for the safety valves that use O-rings on valve seats as pressure seals. PSV-125 A/B was granted a variance on November 21, 1978 (see Equipment Equivalency Request II). Letters requesting equivalency for PSV-129 A/B and PSV-130 A/B were written on September 11, 1979 and March 14, 1980, respectively. These letters were written to comply with provisions of the Equipment Equivalency Request II. Copies of the letters are also attached.

5. There were two open bags of asbestos found in the asbestos mixing area. Cut open asbestos bags shall not be left overnight unless they are adequately sealed.

The two bags were used that next day. The asbestos mixing area is a dedicated area designed to handle dry asbestos. The room is maintained under negative pressure and the air is exhausted outside to a water scrubber. Personal protective equipment is required to be used by all personnel entering the room. The bags of asbestos are normally sealed. Occasionally, several bags may be open awaiting use the next day. Open bags are not left out for an extended period of time.

6. The wet scrubber at the asbestos preparation building did not have a pressure drop indicator or a fluid flow indicator.

The scrubber for the asbestos storage area is alarmed to the control panel. The alarm is tied to the blower motor. Also, the water has a flow indicator which cuts the blower motor off when the scrubber loses water flow. The loss of the blower motor triggers the alarm. This instrumentation is felt to be a reliable indicator of the wet scrubber operation.

Sincerely,

Chris Ham

Chris Ham
Environmental Control

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Attachments

bcc: Roddey Peebles
Al Baker