

ENCLOSURE "A"

Conoco, Inc. shall submit to EPA, Region IV the following information and documentation regarding its polyvinyl chloride (PVC) production facility located at Aberdeen, Mississippi, pursuant to the authority of Section 114 and subject to the sanctions of Section 113 of the Clean Air Act, as amended (42 U.S.C. 7414 and 7413):

1. A list of all relief discharges of vinyl chloride monomer (VCM) which occurred at the PVC Plant for the period beginning February 2, 1979 to the present, and include the following information for each discharge:
 - a. Identification of the equipment source(s) and relief device(s), which includes the known or estimated concentration of VCM (by weight or volume percent) in the affected equipment at the time of the discharge. Also include a process flow diagram of the source relative to discharge point and ground level.
 - b. Date and time of the start and termination of the discharge as well as total time that discharge occurred.
 - c. Description of the nature and cause of the discharge. Describe in detail the primary and/or related cause(s) of the relief discharge of VCM.
 - d. A statement confirming whether or not the affected equipment was in vinyl chloride (VC) service at the time of the discharge, which is based on past and/or current service history and, if possible, supplemented by dated copy of applicable VCM concentration analyses and identification of VCM analytical method used.
 - e. The approximate total quantity of VCM discharged in pounds and a dated copy of the calculations, which estimate the total quantity of VCM discharged in sufficient detail to assess the validity of such calculations.
 - f. A detailed description of all relevant corrective steps taken before and during each discharge to prevent and/or minimize the release of VCM to the atmosphere including, but not limited to, such steps as rerouting VCM emission vents to a collection vessel or incinerator. X
 - g. A description of all measures taken to prevent a future similar occurrence of each discharge including, but not limited to, process equipment/instrumentation changes, changes in operating and maintenance procedures and operator training program. State the dates when each change was initiated and completed. X

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- h. A dated copy of all PVC Plant documents relating to each discharge. This should include all related portions of reports regarding each discharge incident including, but not limited to:
 - (1) VCM leak detection data and daily plant logs (e.g., affected process equipment operating, maintenance and calibration logs and general plant and shift foreman logs),
 - (2) the operating temperature and pressure parameter recordings of the affected equipment (identify the pressure and temperature of the affected equipment at the time the discharge occurred),
 - (3) calculation of the VCM concentration of the discharge in parts per million by volume (ppmv) of vinyl chloride (e.g., the average VCM concentration for the discharge time period).
 - i. Description of any external conditions, such as weather or other process upsets, which Conoco, Inc. believes was related to the cause, containment, control or termination of each discharge.
 - j. Identification and description of any deviations from the existing standard operating and maintenance procedures or equipment testing and calibration procedures, and explain the reasons for each deviation.
 - k. For each discharge, a statement whether Conoco, Inc. believes it was or was not preventable, including the basis for that position. Include copies of any other documentation which Conoco, Inc. believes justifies their position.
2. The following information for each relief discharge of VCM which has been identified in Question 1 as being caused, in whole or in part, by employee, operator, maintenance or construction error:
- a. A complete and detailed description for each incident of error or inattention.
 - b. A list of each person by name and position whose actions contributed to the discharge, along with the names of his immediate supervisor and all other persons on that shift during the discharge responded in any way to the discharge.
 - c. A dated copy of all instructions given to the affected person(s) since October 21, 1976, regarding prevention of relief discharges of VCM.

- d. Description of the history of each affected person(s) training in routine and in emergency procedures to prevent VCM discharges since October 21, 1976. Include dates and subject matter of such training.
3. A dated copy of all PVC Plant documents regarding (1) standard process operating and maintenance (O&M) procedures, (2) equipment testing and installation procedures, and (3) training manuals (or other instructions) that have been made and/or employed at the PVC Plant since October 21, 1976, and which relate to prevention of relief discharges of VCM. X
4. For each VCM discharge identified in Question 1 as being caused, in whole or in part by equipment malfunction or defect, the following information:
 - a. Description in detail of the cause of the malfunction or defect which resulted in the VCM discharge.
 - b. Description of the applicable inspection and maintenance procedures for the equipment that malfunctioned and identification of the frequency of inspection required by such procedure. If the actual inspection/maintenance of the affected equipment is not consistent with the required procedure, describe the inconsistency and explain why. X
5. For each VCM discharge identified in Question 1 as being caused, in whole or in part by premature failure of rupture disc(s), the following information to the extent that it was not addressed in Question 1:
 - a. Identification of the manufacturer and description of the type of rupture disc(s) and rupture disc material being used on the affected equipment.
 - b. For each affected rupture disc, a statement setting forth:
 - (1) the length of time the disc was in service prior to its failure and the number of rupture discs in service for a similar length of time,
 - (2) the rated burst pressure and temperature,
 - (3) its percent allowance as specified by the manufacturer,
 - (4) the temperature and pressure at which the discharge occurred.
 - c. Description of the corrective action taken immediately after the discharge to prevent subsequent rupture disc failures.

- d. Description of the primary cause of the premature failure of each rupture disc that resulted in a VCM discharge based on Conoco, Inc.'s investigation.
6. A list of VCM emission discharges which occurred at the PVC Plant for the period beginning February 2, 1979, to the present. This should include VCM emission discharges that occurred from any applicable process area including, but not limited to the PVC reactor area, VCM railcar unloading area, VCM storage, weighing and holding vessels, VCM recovery, waste water stripping systems and respective pumps, compressors, lines and filters. The list should include the following information for each discharge:
 - a. Identification of the equipment source(s) and relief device(s), which includes the known or estimated concentration of VCM (by weight or volume percent) in the affected equipment at the time of the discharge. Also include a process flow diagram of the source relative to discharge point and ground level.
 - b. Date and time of the start and termination of the discharge as well as total time that discharge occurred.
 - c. Description of the nature and cause of the discharge. Describe in detail the primary and/or related cause(s) of the discharge. If a discharge was considered by Conoco, Inc. to be a leak, state why this position was taken by Conoco, Inc.
 - d. A statement confirming whether or not the affected equipment was in vinyl chloride (VC) service at the time of the discharge, which is based on past and/or current service history and, if possible, supplemented by dated copy of applicable VCM concentration analyses and identification of VCM analytical method used.
 - e. The approximate total quantity of VCM discharged in pounds and a dated copy of the calculations, which estimate the total quantity of VCM discharged in sufficient detail to assess the validity of such calculations.
 - f. A detailed description of all relevant corrective steps taken before and during each discharge to prevent and/or minimize the release of VCM to the atmosphere.
 - g. Description of all measures taken to prevent a future similar occurrence of each discharge including, but not limited to, process equipment/instrumentation changes, changes in operating and maintenance procedures and operator training program. State the dates when each change was initiated and completed.

- h. A dated copy of all PVC Plant documents relating to each discharge. This should include all related portions of reports regarding each discharge incident including, but not limited to:
 - (1) VCM leak detection data and daily plant logs (e.g., affected process equipment operating, maintenance and calibration logs and general plant and shift foreman logs),
 - (2) the operating temperature and pressure parameter recordings of the affected equipment (identify the pressure and temperature of the affected equipment at the time the discharge occurred),
 - (3) calculation of the VCM concentration of the discharge in parts per million by volume (ppmv) of vinyl chloride (e.g., the average VCM concentration for the discharge time period).
 - i. Description of any external conditions, such as weather or other process upsets, which Conoco, Inc. believes was related to the cause, containment, control or termination of each discharge.
 - j. Identification and description of any deviations from the existing standard operating and maintenance procedures or equipment testing and calibration procedures, and explain the reasons for each deviation.
- 7. A list of all uncontrolled VCM emission discharges to the atmosphere which occurred at the PVC Plant as the result of bypassing the incinerator control device due to equipment malfunction, operating error, loss of incineration capability or during efforts to reroute VCM emission vents to a holding or collection vessel until incineration was restored or plant was shut down. The list should also include the information requested by Questions 1.a, 1.b, 1.c, 1.d, 1.e, 1.f, 1.g, 1.h, 1.i, 1.j, and 1.k for each discharge identified.
 - 8. A copy of the engineering drawing, standard operating procedures, any applicable maintenance procedures, and periodic testing procedures, for the short-stop injection systems (including both alpha methyl styrene and nitric oxide). What is the frequency of use of the short-stop injection systems?
 - 9. A copy of any written emergency power failure procedures to prevent discharges of VCM since October 21, 1976.

10. A dated copy of process operating conditions and flow diagram sheets for each of the following systems:
 - a. VC charge system.
 - b. PVC polymerization system.
 - c. VC recovery system.
 - d. Vent containment system.
 - e. Emission recovery system.
 - f. Water stripping system.
 - g. Vent incineration system.

Instructions for Responding to Enclosure "A"

For purposes of responding to the requirements of Enclosure "A", the following instructions apply:

1. Each copy of the documents submitted should be marked or labeled with reference to the number and subsection of the question in response to which it is submitted.
2. In responding to questions requiring that Conoco, Inc. identify a person, the answer should include:
 - a. the name and business address if the "person" is a company or other business or governmental agency, and
 - b. the name and the title (functional position) and business address if the "person" is an individual.
3. In providing an answer to those questions requiring information for more than one discharge, please indicate clearly to which discharge you are referring.

In responding to the requirements of Enclosure I, the following definitions apply:

1. "Document" means all writings, whether printed or recorded or reproduced by any other mechanical process, or written or produced by hand including files, records, logs, studies, working papers, hearings and reports, correspondence, telegrams, inter- and intra-office memoranda and communications, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, graphs, reports, notebooks, note charts, plans, drawings, sketches, maps, summaries or records of meetings and conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs and letters.
2. "PVC Plant" means the polyvinyl chloride production facility owned and operated by Conoco, Inc. at New Highway 25 in Aberdeen, Mississippi.
3. "Person" means an individual, firm, partnership, association, corporation or other business or governmental entity.
4. "Emergency relief discharge(s) of VCM" has the same meaning as defined in 40 CFR, §§61.64(a)(3) and 61.65(a).
5. "Relief discharge of VCM" means a discharge of VCM to the atmosphere from equipment in vinyl chloride service that occurs
 - (1) unintentionally for any reason or
 - (2) in any manner which is designed or intended to relieve, reduce or

prevent pressure that is considered to be excessive within the equipment.

6. "Process operating conditions" shall refer to, but not be limited to, operating temperatures, operating pressures, phase of the stream, chemical compositions, molecular weights, mass flow rates and density of each individual chemical constituents at normal and maximum operating conditions, and total mass flow rates and total volumetric flow rates.
7. "VCM emission discharge(s)" means a discharge(s) of VCM to the atmosphere in excess of any VCM emission limitation specified in 40 CFR 61 - Subpart F from any equipment not already identified as a "relief discharge of VCM" or an "emergency relief discharge".

ENCLOSURE "B"

STATEMENT ON CLAIMS OF CONFIDENTIALITY

1. Section 114(c) of the Clean Air Act [42 U.S.C. 7414(c)] provides that any records, reports or information obtained by the Environmental Protection Agency under the authority of Section 114(a) shall be made available to the public. However, that section further provides that, EXCEPT FOR EMISSION DATA, access to such records, reports or information, or particular part thereof, will be denied to the public under the following circumstances. If any person makes a showing satisfactory to the Administrator of the Environmental Protection Agency that the records, reports or information, or any particular part thereof, would, if made public, divulge methods or processes entitled to protection as trade secrets of such person, then the Environmental Protection Agency (EPA) is required to consider such record, report or information, or particular part thereof, as confidential in accordance with the purposes of 18 U.S.C. 1905. Nevertheless, Section 114(c) further provides that even though access to the public is denied, such record, report or information may be disclosed to other officers, employees, or authorized representatives of the United States concerned with carrying out the Clean Air Act or, when relevant, in any proceeding under the Clean Air Act.
2. Public availability is also required by the Freedom of Information Act, 5 U.S.C. 552. That Act requires public availability generally of all documents in the possession of the Government, with certain very narrow exceptions. One of these exceptions is for trade secrets and commercial or financial information if they have been obtained from a person and if they are privileged or confidential.
3. The regulations under which EPA handles request by the public for information and requests by persons for confidential treatment of information are found in Part 2 of Title 40 of the Code of Federal Regulations.
4. If you wish, you may assert a business confidentiality claim covering part or all of the records, reports, or information which you provide to EPA. Such a claim of confidentiality should be made at the time the record, report, or information is provided to EPA. If no claim has been made when the material is received by EPA, the records, reports or information may be made available to the public without further notice to you. If you do make a claim of confidentiality when providing the material to EPA, the records, reports or information covered by the claim will not be disclosed to the public, except to the extent and by means of the procedures set forth in Subpart B of Part 2 of Title 40 of the Code of Federal Regulations.

5. You should give clear NOTICE at the time you provide the material --

(a) That you claim confidentiality and

(b) Which specific records, reports or information, or part thereof, you claim to be confidential. No particular form of words is required as long as it is clear that a claim is being made and the confidential portion is so marked; for example, each page of a document on which confidential information is found should be marked. To the extent feasible, a justification should be provided with every claim of confidentiality.

6. "Emission data," which cannot be considered confidential, means, with reference to any source of emission of any substance into the air --

(a) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

(b) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner or rate of operation of the source); and

(c) A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).