



Lake Charles VCM Plant

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

RECEIVED

May 4, 1983

DATE TO:	_____
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FILE:	LCVCW

Mr. Greg J. Gasperecz
Air Compliance Division
Department of Natural Resources
P O Box 44066
Baton Rouge, LA 70804

Dear Mr. Gasperecz:

This letter is in response to your questions concerning the Conoco VCM Plant's semi-annual report (dated March 15, 1983) on vinyl chloride emissions as required by Section 61.70 of the Vinyl Chloride National Emission Standard for Hazardous Air Pollutants. On January 17 and February 19, 1983 the 24-hour average for vinyl emissions in the oxychlorination reactor vent exceeded the 0.2 gm/Kg of EDC limit. Both excursions were caused by difficulties with Oxychlorination reactor train during startup of the system. The difficulties in both cases were caused by two unique catalyst performance problems which have since been corrected by the conversion to O₂-based oxychlorination and by catalyst change-out.

On both days, the oxychlorination section operated for less than 4 hours. Thus the excursions during this short period of operation in excess of the 0.2 gm/Kg limit caused the "24 hour" average to also exceed 0.2 gm/Kg.

Your second question concerned the VC emissions rate during the December 12, 1982 incinerator bypass. Table I lists the estimated emissions per hour for this time period. This estimate is based on an engineering evaluation completed for the O₂-oxy conversion and prorated for 1.6MM lbs/day production rate on December 12, 1982.

If you have any further questions, please contact Ron Bryan at (318) 491-5062.

Sincerely,

J. A. DeBernardi
VCM Plant Manager

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cc: Mr. William H. Taylor, Jr.
U.S. EPA Region VI

Mr. Joe Withers
Southwest Regional Office

bcc: JWW-RB-MLA-PLF-DLD-MWC-JCL-BIR-ESW-MGH

VVC 000014044

TABLE I
Typical Vinyl Chloride Emissions (1)
During an Incinerator By-pass

<u>Vent Source</u>	<u>VCM Vent Rate</u> <u>lbs/hr (2)</u>
Direct Chlorinator Vent	2.74
Light Ends Column Vent	15.85
Tank Farm Vent	<u>.76</u>
Total	19.35

Notes

- 1) The typical VCM emissions corrected for VCM production rate are calculated as follows:

$$\text{VCM Vent Rate Corrected for Prod.} = \frac{\text{Total Vent Flow}}{\text{VCM Concentration}} \times \frac{\text{VCM Production in MM Lbs./Day}}{2.1}$$

The total vent flows and VCM concentrations were obtained from the projected Modernization Material balance at full VCM production rates (2.1MM Lbs./Day).

- 2) Corrected for the 1.6MM lb of VCM/day production rate on December 12, 1982.