

February 25, 1977

Conoco Chemicals
Continental Oil Company
P.O. Box 91, New Highway 25
Aberdeen, Mississippi 39720

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United States Environmental Protection Agency
Suite 300
1421 Peachtree Street
Atlanta, Georgia 30309

Attention: Mr. Thommie A. Gibbs, Chief, Air Engineering Branch

Dear Sir:

We have received your letter of February 10, 1977 regarding our request for a waiver of compliance with the vinyl chloride standards of the National Emission Standards for Hazardous Air Pollutants. We have reviewed the changes as proposed by the EPA. We offer the following arguments and revisions regarding our compliance schedule:

Items I, II, IV, VI, VIII, IX, XI, and XII contain references to module No. 2. This system includes extensive revisions specifically required for vinyl chloride emission control. ~~This module will be inoperable until the compliance system is fully functional.~~ That is, this facility will ~~be shutdown until we are able to meet EPA Emission Limitations. As such,~~ a special compliance schedule is not applicable, as we will not be operating out of compliance at any time in this system. We will not be operating module No. 2 until about February 1, 1978, and will be in compliance upon initial operation. The exact date of initial operation is not within our control but is projected at about February 1, 1978. In any event, module No. 2 will not, at any time, function such that emissions in excess of the VCM standard occur.

I. Reactor Exhaust Gases:

We have no comment on the proposed EPA schedule except as noted above.

II. Reactor Opening Loss:

We are now in compliance relative to reactor opening loss. Our ability to demonstrate that we are in compliance is dependent upon the EPA's acceptance of our proposed method of calculating this quantity. If the calculational method is not accepted as equivalent, then additional time will be needed to develop a technique of demonstrating compliance.

III. Emission from Mixing, Weighing, and Holding Containers:

We have no comment on the schedule revision proposed by the EPA. We will work to meet the EPA's schedule.

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IV. Sources Following the Strippers:

Regarding this item our schedule as proposed called for operation at 400 ppm to be achieved by June 30, 1977. The EPA's proposed date of June 1, 1977 for achieving 400 ppm operation is acceptable. There is, however, no way we can complete any compliance performance tests by June 1, 1977, as we will not be able to routinely sample each reactor batch until late in May. Our ability to sample each reactor batch awaits delivery of analytical equipment. Until late in May we will be limited to about three or four reactor samples per day.

V. Loading and Unloading Lines:

After reviewing our project schedule for the various EPA compliance items, we do not think we can possibly make the construction completion date of January 1, 1978. This project involves rather massive structural work which will be time consuming to build and engineer. The earliest we can visualize completing construction is February 15, 1978 with compliance being achieved on April 1, 1978. We ask the EPA to reconsider and accept our revised dates.

VI. Rotating Pump Seals:

We have no comment on the EPA's proposed schedule and will attempt to meet the new dates.

VII. Reciprocating Compressor:

As of now the machine vendors do not manufacture the required parts. Assuming such parts are available we certainly can order them by May 31, 1977. Our discussions with the compressor manufacturer indicates that parts will not be available until late summer. We ask the EPA to accept a "Purchase Order Issued" date of September 1, 1977.

VIII. Agitator Seals:

No comment. The EPA's proposed schedule is acceptable.

IX. Relief Valve Leakage:

No comment. The EPA's proposed schedule is acceptable.

X. Opening Of Equipment:

No comment. The EPA's proposed schedule is acceptable.

XI. Samples:

No comment. The EPA's proposed schedule is acceptable.

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XII. In Process Waste Water Stripping:

Our only comment on Item XII is to remind the EPA that we will not be able to consistently achieve the 10 ppm limit in waste water until completion of the Vent Gas Emission Recovery System. The schedule to Item XII is accepted as long as it refers only to the process water collection system, as was described in our compliance waiver request.

XIII. Vent Gas Emission Recovery System:

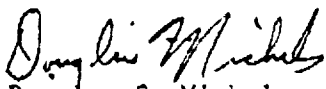
We have again reviewed this schedule and find the "Purchase Order Issued" date very difficult. The best we think we can do is August 1, 1977. The remaining date under this item is acceptable.

XIV. Vent Gas Incineration:

We have very significant problems with Item XIV. We are now in the process of finalizing our process design. This will be complete by April 1, 1977. We will then apply to the State of Mississippi for their "Approval for Construction". By law the State of Mississippi is allowed three months for review. Using this schedule, which is extremely optimistic, our best date is August 15, 1977. The July 1, 1977 is not feasible. Please note that we feel that some sort of pilot work is desirable. We have no experience with incineration and we are relying on the EPA's judgment that incineration works. If this is not the EPA's position, (i.e. incineration is proper technology) then we should be allowed to conduct pilot work which would delay our optimistic schedule by about three months.

As I indicated on the phone to Mr. Beals, we are extremely anxious to resolve these problems. Please review the previous information carefully and let us know of your decisions. We remain willing to supply additional information or to go to Atlanta to discuss and resolve these problems.

Sincerely,


Douglas E. Michels
Chief Process Engineer

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